WELTY Roger

From:
Sent: Thursday, February 14, 2008 6:30 PM
To: WELTY Roger
Subject: Oregon Department of Forestry

State Forests Program
Oregon Department of Forestry
Attn: Roger Welty

Greetings:

Please stop clear-cutting our watersheds. Herbicide in our drinking water is poisoning us and our wildlife. Since Marvin Brown has been State Forester, there are mostly clear-cuts that are spayed with carcinogenic and neuro-toxic chemicals find their way into our drinking water. People are getting chronically sick and even dyeing from this gross mismanagement of our public forests. State forestry must set a good example for the industry, not poison us and turn our public lands into lifeless wastelands.

Of great concern is Hanson Falls timber sale of Rackheap Marbled Murrelet Management Area.

Sincerely,

Iva O

Oregon
Theodore R. Kulongoski, Governor

Department of Forestry
Tillamook District
5005 Third Street
Tillamook, OR 97141
Phone: (503) 842-2545
FAX: (503) 842-3143

May 28, 2008

Dear Ms. O.,

"STEWARDSHIP IN FORESTRY"

The Oregon Department of Forestry (ODF) sincerely appreciates your interest in the management of state forest lands. Public involvement is an important component of our State Forests Program, and we genuinely consider the concerns and questions expressed by individual stakeholders such as you. We would like to respond to your concerns about clearcuts, herbicide use, and the Hansen Falls timber sale. Answers to your concerns could have been more condensed, but hopefully the longer version will be more helpful in understanding forest management on State Forest lands.

As you may be aware, approximately 98 percent of state forests are "Board of Forestry Lands" which the counties deeded to the state approximately half a century ago. By law, these lands are to be managed for the "Greatest Permanent Value" for the people of Oregon. The "Greatest Permanent Value" has been defined in administrative rule (OAR 629-035-0020) as:

> (1) As provided in ORS 530.050, "greatest permanent value" means healthy, productive, and sustainable forest ecosystems that over time and across the landscape provide a full range of social, economic, and environmental benefits to the people of Oregon. These benefits include, but are not limited to:
>
> (a) Sustainable and predictable production of forest products that generate revenues for the benefit of the state, counties, and local taxing districts;
> (b) Properly functioning aquatic habitats for salmonids, and other native fish and aquatic life;
> (c) Habitats for native wildlife;
> (d) Productive soil, and clean air and water;
> (e) Protection against floods and erosion; and
> (f) Recreation.

The "Greatest Permanent Value" for these lands is achieved by managing them consistent with the Northwest Oregon State Forest Management Plan (NWFMP) of 2001. It can be viewed at the following website or at any of our District offices.

http://egov.oregon.gov/ODF/STATE_FORESTS/nwfmp.shtml

Clearcut Harvest Types

On page 4-47 of the NWFMP begins the description of our landscape management strategies, which are to be implemented on state forest lands. Under these strategies, state forests are to be actively managed so that an array of stand structure types are present across the landscape in proportions similar to those identified in Table 4-2.

One of the objectives is to provide a stand structure type termed "regeneration." It is a very young stand type that is in early stages of development. Regeneration structure is one of five stand types defined in the NWFMP and is described as follows:

> "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." (pg. C-4)

Clearcut harvesting is one tool used to create regeneration structure. It is also used to meet a number of other management objectives such as providing a sustainable supply of timber and revenue for achieving social and economic goals. On state forest lands however, the clearcut type of harvest system has been modified so that it is designed to more emulate disturbance events inherent to forests in NW Oregon, such as windthrow and severe periodic storms for example. While modified clearcuts cannot fully emulate natural disturbances, the FMP directs that a certain number of green conifer or hardwood trees and shrubs be retained, and that a sufficient amount of snags and large woody debris be maintained or created in order to provide important components for future forest development.

As more information about the importance of regeneration structure has become available; providing it in sufficient amount and quality has become more of a management focus in certain areas. A recent symposium held at Oregon State University highlighted the importance of regeneration structure, also known as early-seral habitat, which is a form of young stand development. This stage of forest development is important to many wildlife species such as certain birds and mammals dependent on open habitats. Most of the speakers stressed that the quality of this early habitat was dependent on the amount of legacy components (i.e., snags, downed woody debris, brush and forbs) that remained on the site after a disturbance.

When we design a modified clearcut, the amount and type of legacy components to be retained after harvest is a primary consideration for providing functional habitat and enhancing site productivity. Additionally, buffers are designed as per NWFMP requirements so that streams are protected too (pg J-1). Prescribed and implemented correctly, modified clearcuts are intended to provide a sufficient amount of early-seral habitat (i.e. regeneration structure) across the landscape while providing diverse, productive forests for the future.

Once harvested, modified clearcut areas are not intended to remain as regeneration structure in perpetuity. The Forest Practices Act requires harvested land to be replanted within 2 years, so areas that have become regeneration stands are re-planted so that they will grow to become young forest stands which in-turn may be managed to one day develop into older stand structures.

Herbicides

The climate of western Oregon is conducive to the rapid growth and development of vegetation. Brush species, particularly in the Coast Range have the potential to out-compete young tree species for growing space, light, and nutrients; sometimes hindering their development and growth. Herbicides, fire, mechanized equipment, manual removal, or doing nothing are methods that are sometimes used to ensure the establishment of young trees in a safe and timely manner.

The use of herbicides is one of the tools sometimes used for reducing the amount of competing vegetation during the establishment of young trees. Only those herbicides that have undergone extensive safety testing and which are registered with the Environmental Protection Agency are

used. During the registration process a minimum of 120 tests are conduced 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.

ODF chooses to use an initial herbicide application prior to planting on most harvest areas to increase the likelihood of success of reforestation. The Forest Practices Act requires harvested land to be replanted and be managed to produce a minimum of 200 trees per acre "free-to-grow" (i.e. seedlings which are above the competing vegetation and should grow into mature trees). The initial herbicide application does not kill all vegetation but does retard growth for 2-3 years allowing tree seedlings to get established and to grow taller than the brush on site.

Because of the large acreage and the difficulty to access harvest areas in steep mountainous terrain most herbicide application is done by helicopter. There are strict rules about weather conditions, buffer areas around water, and many other requirements when using any herbicide so that it is contained only where application is intended. Adjacent landowners or domestic water users are notified in writing before any aerial herbicide applications are applied.

Personnel who oversee the application of herbicides or who spread them are required to have extensive training to insure safe and proper use. Additionally, the rates at which herbicides are applied are very low and the total amount of acreage treated in any single year approximates about 1 percent of the state forest land base in northwestern Oregon.

The Hansen Falls Timber Sale

As you have noted the proposed Hansen Falls timber sale is within the Rackheap Marbled Murrelet Management Area. The purpose of this sale is to give the dominate trees more room to grow, which can be achieved by thinning the portions of the stand that are very dense.

As is described in the pre-operations report for the sale, the desired future condition of these stands is to become old forest structure. So the harvest treatment is intended to promote and accelerate the development of younger trees into larger ones. After harvest, these will remain fully stocked stands and will not require any additional trees to be planted or any chemical application to control competing vegetation.

The harvest design for the Hansen Falls timber sale includes mitigation measures to ensure that the quality of the Marbled Murrelet Management Area is maintained and conserved. These include:

- A contract restriction will be enforced that disallows any harvest or machine operation in the Rackheap Marbled Murrelet Management Area during the breeding and nesting season.
- Protecting portions of the stand that contain platform trees or are developing platform trees (these platforms can be used by marbled murrelets for nesting).
- The ODF wildlife biologist will oversee the identification of platform or potential platform trees and see that they are marked for protection.

- No trees will be cut that pose a risk of falling into the platform trees that are identified.

- The ODF wildlife biologist will monitor the harvest operations to ensure that the prescribed conservation measures are being effective at protecting the degradation of nesting habitat.

The effects of the proposed harvest and the conservation measures to be employed have been analyzed in the Hansen Falls Biological Assessment by our Northwest Oregon Area wildlife biologist. It is our practice to prepare and submit a Biological Assessments to the U.S. Fish and Wildlife Service for consultation for any forest operation that may be proposed in habitats used by threatened and endangered species as a condition of our agreements with them to be in compliance with the Endangered Species Act. The pre-operations report for this sale and the biological assessment that was prepared to analyze its potential effects to the Rackheap Marbled Murrelet Management Area can be viewed on our website at:

http://egov.oregon.gov/ODF/STATE_FORESTS/2009_AOP_Draft.shtml#Tillamook_District__Tillamook_State_Forest_

Hopefully we have addressed adequately the concerns you expressed. Thank you again for your interest in State Forest lands. Please feel free to call or write anytime you have a concern or question. We are very appreciative of the time you took to contact us.

This year public comments will be posted on the web site along with the ODF reply. Your letter will be put into a PDF file in which you will be only identified by your first name and initial of your last name. Your address, email and phone number will be blocked out. Organization letterhead will be retained. If you have any concerns regarding your comments being posted please contact:

Roger Welty, Planning Specialist
Oregon Department of Forestry
2600 State Street
Salem, OR 97310
503-945-7258, fax: 503-945-7376

Sincerely,

Andy White

Andy White
Acting District Forester
Forest Grove and Tillamook Districts

Jerry R.

Oregon Department of Forestry
2600 State Street
Salem, OR 97103

March 14th, 2008

Hello,

I would like to submit this letter to question the value of 3 of the proposed sale areas along a designated Scenic Corridor and the value of leaving a 150 ft corridor on both sides of a designated Scenic Corridor Highway.

Your *State Forests Management Plan, Final Plan, January 2001* publication states that numerous highways are designated as scenic for the purpose of visual corridor management. Hwy 6 and 26 are included (Staff at the Tillamook Forest Center state that Hwy 6 is not a scenic highway however).

Recently I took a couple of folks fishing. They came from Portland and Vermont. The gentlemen from Vermont stated that this was probably the "ugliest drive through a forest I have ever done". His concern and comments prompt me to write this letter.

First, I understand that we need to manage forests. But what good does a 150 ft corridor actually do? Why not extend that distance to a length that will provide a good visual reaction. A change would greatly improve the overall appearance of the designated scenic corridor. Hundreds of thousands of people drive over these roads yearly. Why not allow them to have a more pleasing experience?

Forest management is needed but I believe you are not following your own guidelines in what you have written concerning the visual value of a forest. 150ft is sort of useless.

Your 2008-09 proposed plan indicates that multiple areas have been selected for sale. Three of these are very visible from Hwy 6. Especially interesting is the Lehman Heights sale area. This area, while directly viewable from Hwy 6, includes the area just downstream from Tillamook Forest Center. One of the popular trails from the Tillamook Forest Center will have up to 240 net acres of Modified Clearcut. That will be a visually attractive site along a wilderness river trail...

Beside the Lehman Heights sale area, are the Coast Ford, and Fall Again parcels. Both of these areas are visible from a designated scenic highway.

I strongly recommend that these areas not be considered for possible sale and in the future minimize the harvesting practices along the entire visible scenic corridor.

I apologize for any errors that my data provided. I obtained a copy of your plan, dated 2001, at the Tillamook Office last month. They indicated that this was the latest approved version.

Thank you for your time and consideration.

Jerry R

Jeff W.

Oregon Department of Forestry
2600 State Street
Salem, OR 97103

March 23, 2008

Hello,

I am a proponent of logging and especially in those areas where the trees grow the fastest – the coastal range. I also value the aesthetics of our scenic byways – our highways. I am writing this letter to question in specific our logging practices along highway 6 and 26. Your *State Forests Management Plan, Final Plan, January 2001* publication states that numerous highways are designated as scenic corridors for the purpose of visual corridor management. Hwy 6 and 26 are included. These highways are the most heavily traveled direct routes to the coast from Portland (millions annually) and are vital to the states tourism industry supporting our coastal gems. When visiting, my out of state guests are always appalled by the drive to the coast as I was when I first moved to the state in 1990 and am each time I make the trip.

Between these two highways are countless miles of forest that can be logged while completely preserving the vistas (and especially adjacent lands) and protecting our residents and visitors from the gut wrenching sight of clear cutting. In these massive areas where you can't see the clear cutting from our scenic highways – log as necessary!

In many instances the clear cutting is done allowing ample buffers of uncut timber so it is not evident from the highways, in others it is clearly not.

Often when harvesting the back sides of hillsides (trying to conceal the clear cutting) the benefit is lost because the logging is done up to the top of the hill so the ridgeline is either see through or toothy looking, both which look gruesome and defeat the purpose. By modifying practices and increasing the uncut buffer in these instances by an additional 10 to 20 yards would completely conceal the clear cut.

The selective cut is a visually pleasing practice but only when leaving enough trees to look like a naturally thin forest and then gradually blending it into the unharvested timber (versus a black and white approach), which is not the current practice.

What is the value of leaving a 150 ft corridor on both sides of a designated Scenic Corridor Highway. What scenic value does this provide the corridor when clear cutting just beyond it?

What is the states definition of Scenic Corridor? Is this definition consistent amongst state agencies? Crown Point is a State Scenic Corridor.....

The Wilson River Highway west of the coastal range summit, where the highway runs adjacent to the river, is an especially beautiful stretch of Scenic Corridor. Not only is this stretch enjoyed by tourists, it is also an awesome area for outdoor recreation, fishing and hiking. As of late there has been an alarmingly dramatic increase of visible logging in this area.

Your 2008-09 proposed plan indicates that multiple areas in this corridor have also been selected for sale. Three of these are also very visible from Hwy 6. Lehman Heights which is directly viewable from Hwy 6, includes the area just downstream from Tillamook Forestry Center. This is one of the most

popular trails from the Center. It will have up to 240 net acres of Modified Clearcut adjacent to it. This seems incongruent with its cause.

Beside the Lehman Heights sale area, are the Coast Ford, and Fall Again parcels. Both of these areas are visible from this designated scenic highway.

I strongly recommend that these areas not be considered for possible sale and in the future minimize the visible harvesting practices along this entire Scenic Corridor. I also recommend the refining our state logging practices to include an aesthetic consequences component.

The timber industry spends millions of dollars annually on public relations and marketing to defend its image and promote the values of forest management. The State of Oregon is no exception. With a little more thoughtful forest sales planning and sensitivity to logging aesthetics and practices the forestry industry could minimize much of these adverse costly effects they create for themselves.

Thank you for your time and consideration.

Jeff W

Oregon
Theodore R. Kulongoski, Governor

Department of Forestry
Tillamook District
5005 Third Street
Tillamook, OR 97141
Phone: (503) 842-2545
FAX: (503) 842-3143

May 28, 2008

Jerry R
Jeff W.

"STEWARDSHIP IN FORESTRY"

The Oregon Department of Forestry sincerely appreciates your interest in the Tillamook State Forest. Public involvement is an important component of our State Forests Program, and we genuinely consider the concerns and questions expressed by individual stakeholders such as yourself. You raise several questions about the Tillamook District's 2009 Annual Operations Plan. Answers to your questions could have been condensed, but the longer version should be more helpful in understanding forest management on State Forest lands.

Approximately 98 percent of state forests are "Board of Forestry Lands" which the counties deeded to the state approximately half a century ago. By law, these lands are to be managed for the "Greatest Permanent Value" for the people of Oregon. The "Greatest Permanent Value" has been defined in administrative rule (OAR 629-035-0020) as:

> (1) As provided in ORS 530.050, "greatest permanent value" means healthy, productive, and sustainable forest ecosystems that over time and across the landscape provide a full range of social, economic, and environmental benefits to the people of Oregon. These benefits include, but are not limited to:
>
> (a) Sustainable and predictable production of forest products that generate revenues for the benefit of the state, counties, and local taxing districts;
> (b) Properly functioning aquatic habitats for salmonids, and other native fish and aquatic life;
> (c) Habitats for native wildlife;
> (d) Productive soil, and clean air and water;
> (e) Protection against floods and erosion; and
> (f) Recreation.

The "Greatest Permanent Value" for these lands is achieved by managing them consistent with the Northwest Oregon State Forest Management Plan (FMP) of 2001.

As you may know, there are many different landowners that are intermingled with the Tillamook State Forest, particularly along the Wilson River highway. It is difficult to know whether the observations of you and your companions of the clearcut parcels along the highway were private or State Forest parcels. These various ownerships are often managed with different objectives in mind. Forest management on both private and state forests however must be compliant with the Oregon Forest Practices Act (Oregon Revised Statute 527, and Oregon Administrative Rules chapter 629, divisions 605 through 665).

As you recognize in your letter, State Forest lands are managed according to the FMP, which as you have noted include strategies for maintaining scenic and visual quality. The 150 foot visual buffer that is noted in the FMP (pg. D-26) is the minimum that is required by the Oregon Forest Practices Act. But there is another component of the FMP called the Land Management Classification System (Oregon Administrative Rule 629-035-0055). You can view a copy of this rule in the very back of the FMP. It identifies a degree of additional management focus in certain areas, such as visually sensitive zones.

On the Tillamook District, there is a broad corridor paralleling the Wilson River Highway that is designated as a Level 1 (highly sensitive) or Level 2 (moderately sensitive) visual status. Scenic resources in these designated zones require a greater level of protection, as is discussed in chapter 4 of the FMP (pgs) 4-105 to 4-107). In short the visual quality in these scenic corridors is a high priority to retain; as such harvest areas on state forest lands along the Wilson River highway are carefully planned so that they are seldom visible to most travelers. On private forest lands visual impacts are also required by the Forest Practices Act to be minimized, yet there are provisions for safety considerations which may take precedence over visual concerns. As a result, visual buffers on private lands along a principle highway may - in places - not conceal a harvest unit.

In your letter concern is expressed over three proposed sales in the Tillamook District's 2009 Annual Operations Plan, Lehman Heights, Coast Ford, and Fall Again. An individual district's Annual Operations Plan (AOP) contains within it what we call "pre-operation reports". Maybe you have viewed these. They provide documentation of the initial planning phase by the field foresters of a particular sale that is proposed and include detailed maps. Pre-operation reports for any district's 2009 AOP can be viewed at our website:

http://egov.oregon.gov/ODF/STATE_FORESTS/2009_AOP_Draft.shtml

If you were to view the pre-operations map for Lehman Heights titled, "Key Resources" you would notice that there are three designated sale areas. Areas 1 and 2 are the modified clearcuts you identified. Area 3 is a 183-acre buffer area between the Wilson River and the harvest areas that will not be logged, although some snags and downed woody debris will be created to enhance wildlife habitat and site productivity. Also planned is a green-tree retention stringer, and stream buffers which will also remain intact. Furthermore, notice the shape of the sale area boundary and how its eastern edge swings north so that there is a large parcel outside that remains intact between the river and the harvest areas. The placement of these features coupled with the steep topography is intended to prevent a direct line of site from the highway to the harvest areas on the upper slopes of the ridge top.

With regard to the Coast Ford sale, it is situated well back from the highway because there are a number of private land parcels between the highway and the state forest boundary (see pre-operations map). Additionally, the placement of harvest areas 2 and 3 is such that topography would prevent a direct line of site to them from the highway. There may be however, a portion of the southeastern half of unit 1 that could be visible from the highway. The prescription for area 1 is what we call a retention cut, which means it is basically a very heavy thinning. Drivers may be able to catch a brief glimpse of some of the unit and will be able to tell that there has been some harvest activity, but it would not be conspicuous due to the overstory trees that will be retained on site.

Similarly, the Fall Again sale is placed nearly a half mile away from the Wilson River and the highway. It too is situated far up the ridge so that the natural topography of the steep mountains will prevent a direct line of site from passersby on the highway.

Such design features are intended in-part to insure that the scenic quality of the view shed remains uncompromised. These features also insure that the Wilson River trail is well outside of any areas that would be logged. In short, the buffers are designed to be far greater than the minimum 150 feet required by the Forest Practices Act. Foresters who know the ground intimately conduct analyses of where the lines of site are from key locations along the Wilson River Highway and certain trails, thereby incorporating into their planning measures design features intended to protect the scenic quality of state forests in the corridor.

The State Forests Program is committed to abiding by the directives and mandates of the Northwest Oregon Forest Management Plan. The plan recognizes the many resource values afforded by state forests. As such, the field foresters at the Tillamook District strive to balance a myriad of resource goals to achieve the objectives in the FMP.

You also recognized in your letter that the Wilson River Highway is designated as scenic in the FMP, but that staff at the Tillamook Forest Center indicated that it is not. The confusion lies in differences between designations by individual agencies. For example, the Oregon Department of Forestry may recognize certain segments of a principle highway as scenic, but the Oregon Department of Transportation may designate it differently. Many folks may be unaware of such differences and the contrasts between management because of them, which is similar to the contrasts in land use objectives between public and private landowners.

Thank you again for your interest in State Forest lands. Hopefully we have addressed your concerns adequately. Please feel free to call or write anytime you have a concern or question. We are very appreciative of the time you took to contact us.

This year public comments will be posted on the web site along with the ODF reply. Your letter will be put into a PDF file in which you will be only identified by your first name and initial of your last name. Your address, email and phone number will be blocked out. Organization letterhead will be retained. If you have any concerns regarding your comments being posted please contact:

Roger Welty, Planning Specialist
Oregon Department of Forestry
2600 State Street
Salem, OR 97310
503-945-7258, fax: 503-945-7376

Sincerely,

Andy White

Andy White
Acting District Forester
Forest Grove and Tillamook Districts

SIERRA CLUB
FOUNDED 1892

Comments of D. . . F
Oregon Chapter Sierra Club

Oregon Board of Forestry:
5 March 2008

Good Morning.

My name is D. . . F. . , I am the State Lands Issue Coordinator for the Oregon Chapter of the Sierra Club. We have been actively involved in the Tillamook and Clatsop State Forests for well over 10 years and our members are greatly concerned about the future of these publicly owned lands.

I have been closely monitoring the on-the-ground effects of ODF's implementation of the Forest Management Plan since it was adopted in January 2001. I am here today to convey on behalf of the Club (and its 24,000 Oregon members) the very serious concerns we have regarding the 2009 Annual Operation Plans (AOPs) recently released for public comment, particularly timber sales in Tillamook District.

We are deeply concerned that some of the current operations fail to achieve the greatest permanent value as defined in Oregon statutes and administrative rules. In particular, we feel that many of the planned timber harvests fail to meet requirements for protection of "aquatic habitats for salmonids, and other native fish and aquatic life; ...native wildlife habitats;...soil, air, and water;...and outdoor recreation opportunities" as mandated in ORS 530 and OAR 629-035. We also firmly believe that these plans are not based on the required "best available science."

Let me begin with a few facts from the Tillamook 2009 AOP:

1) 69% of the harvest will be by clear-cutting; that's about 3000 acres.
2) 8 of the 15 primary timber sales have clearcuts greater than 100 acres.
3) 9 of the 15 are planned to clearcut forest designated to become complex.
4) Plans call for thinning in a Marbled Murrelet Management Area, despite the decreasing number of marbled murrelets on ODF lands, and despite the fact that the area biologist notes this sale poses a moderate risk to this imperiled species.

Particularly alarming are operations like the Peak Out timber sale in the Kilchis basin, which plans to clearcut 119 acres of "Understory" that is designated to become layered. How does clearcutting these mixed conifer-hardwood improve forest structure? Or consider the Fitch Creek timber sale, also in the Kilchis basin, which will clearcut 534 acres in 7 different units. According to page 6 of the Fitch Creek Draft Pre-Operations Report: "The risk of landslides delivering directly from the sale to all streams is high." Why are we clearcutting this basin. The ODF states that it "is made up of steep terrain with many high landslide hazard locations (HLHL) and deeply incised high energy stream systems."

SIERRA CLUB
FOUNDED 1892

In the Astoria District, Unit 4 of the Buzzard Ridge Combination timber sale will clearcut 99 acres of understory within the viewshed of the Spruce Run campground. Unit 4 has a "moderate" risk of landslides delivering directly into the Nehalem River.

These sales are just a few examples of the pressures to deliver more from these forests than they can bear. Most troubling, however, is the extensive clearcutting of lands designated to become complex. I ask myself, "Why is ODF clearcutting large tracts of forest that are designated to become complex forest structure?" This is what I found in the "Landscape Design" section of the Tillamook 2009 AOP. "The stands shown as complex structure were identified as having the potential to move most quickly toward complex structure." The FMP's plain language does not support clearcutting these forest. The AOP goes on to say "...stand designations are being re-assessed and will be formally modified with an IP revision."

As the ODF has stated the current Implementation Plans (IPs) are in place for 10 years. These IPs were approved 5 years ago and are not due to be "modified" for 5 years. I understand that the BOF is currently considering possible revisions to the FMP, but those revisions are neither drafted nor approved. Is the Tillamook District now ignoring the landscape design approved in 2003, clearcutting stands designated to become complex, and then saying they will change the maps at some future date?. Sure looks that way.

In summary, as I look over the many sales in the 2009 Annual Operating Plans, it is obvious that many are coming at the expense multiple values noted in the administrative rule. Forest types that are increasingly rare in the industrial tree-farms that dominate the northern coast range are being clearcut. Moreover, many clearcuts are on steep slopes above fishbearing streams. The utter disregard for landscape design shown by these proposals from the Tillamook District threatens the fundamentals of the long-term plan. These 2009 AOPs threaten ODF's social license to manage for the greatest permanent value.

Despite the harms caused by the 2009 sales at current harvest levels, the BOF is now calling for study of a 30-35% increase in revenue to the governments -- which will inevitably mean significant increases in timber harvests. There is no way ODF can do that without significantly degrading the environment. Our members will certainly oppose the expansion of even more elements of the industrial tree-farm model to these public lands.

Thank you for the opportunity to address you today.

D. F.
State Lands Issue Coordinator
Oregon Chapter Sierra Club

Oregon
Theodore R. Kulongoski, Governor

Department of Forestry
Tillamook District
5005 Third Street
Tillamook, OR 97141
Phone: (503) 842-2545
FAX: (503) 842-3143

June 9, 2008

D. F
State Lands Issue Coordinator
Oregon Chapter Sierra Club
2950 SE Stark Street, Suite 110
Portland, OR 97214

Dear Mr. F

The Oregon Department of Forestry (ODF or the Department) appreciates your interest in the Clatsop and Tillamook State Forests. Public involvement is an important component of our State Forests Program. You raise a variety of concerns regarding the 2009 Annual Operations Plans that we would like to address. The responses that follow are intended to be in an order similar to those originally stated in your letter dated March 5th, 2008.

Greatest Permanent Value Rule and Best Available Science

As you are aware, approximately 98 percent of the Clatsop and Tillamook State forests are "Board of Forestry Lands" which the counties deeded to the state approximately half a century ago. By law, these lands are to be managed for the "Greatest Permanent Value" for the people of Oregon. The "Greatest Permanent Value" has been defined in administrative rule (OAR 629-035-0020) as:

> (1) As provided in ORS 530.050, "greatest permanent value" means healthy, productive, and sustainable forest ecosystems that over time and across the landscape provide a full range of social, economic, and environmental benefits to the people of Oregon. These benefits include, but are not limited to:
>
> (a) Sustainable and predictable production of forest products that generate revenues for the benefit of the state, counties, and local taxing districts;
> (b) Properly functioning aquatic habitats for salmonids, and other native fish and aquatic life;
> (c) Habitats for native wildlife;
> (d) Productive soil, and clean air and water;
> (e) Protection against floods and erosion; and
> (f) Recreation.

The "Greatest Permanent Value" for these lands is achieved by managing them consistent with the Northwest Oregon State Forest Management Plan (NWFMP) of 2001. The NWFMP describes the guiding principles, visions, and goals whereby the balance of social, economic, and environmental goals are identified, recognizing that also the goals for one resource may compete to some degree with those of another. It is through the planning process and implementation of the management strategies described in Chapter 4 that the balance of resource goals is to be achieved.

For individual districts, this included the development of their 10-year Implementation Plans (IP's) which were approved in 2003. Each District IP identified the objectives and outputs to be attained over that planning horizon, which equates into the management activities to be planned and conducted annually. The 2009 Annual Operations Plan Summary document for the Astoria and Tillamook Districts identifies operations intended to contribute to attaining the objectives and outputs defined by their IP's. The summary documents can be viewed at the following website:

http://egov.oregon.gov/ODF/STATE_FORESTS/2009_AOP_Draft.shtml#Northwest_Oregon_Summary

In the IP's each District has determined and defined a range of sustainable timber harvest. It equates to the proportion of thinning and regeneration (clearcut) harvest to be conducted annually. Each of the proposed sales in the 2009 AOP for the Astoria and Tillamook Districts is designed using the management strategies defined in Chapter 4 of the NWFMP. At the discretion of the State Forester these harvest levels may fluctuate annually within the defined range depending on a variety of environmental, economic, and social factors. The Tillamook District's IP can also be viewed at the following website:

http://egov.oregon.gov/ODF/STATE_FORESTS/District_Implementation_Plans.shtml

Since the FMP was adopted in 2002, the extent of annual harvest on the Clatsop and Tillamook State Forests and the proportion of regeneration harvests increased steadily until peaking in 2005. On average, partial cuts (thinning) typically comprised roughly 60 percent of the total acres harvested, the remaining 40 percent being regeneration cuts. Since 2005, the total acres of harvest have actually declined by about fifteen percent. Starting in 2007 however, the proportion of regeneration harvest has increased by nearly 7 percent on the three north coast Districts that make op the Clatsop and Tillamook State Forests (Astoria, Forest Grove, and Tillamook). Despite this increase, the acres planned for regeneration harvest on the Clatsop and Tillamook State Forests are approximately 2 percent less than the combined annual average since 2002.

The reason for a change in the proportion of regeneration harvests on the north coast districts is two-fold; first due to improved knowledge and inventory data it has been realized that treating the backlog of stands needing to be thinned has been achieved, thus in the cycle of harvest scheduling there are now more stands that are available for regeneration in some basins. Secondly, there is an expressed need to enhance economic and social goals in the near-term. Since adoption of the IP's there have been a variety of research, monitoring, and inventory efforts that have led to a change in the proportion of regeneration harvests that have been planned over the last several years. The extent proposed in the 2009 AOP however is within the ranges defined in the IP's (as modified).

Contributing research, monitoring, and inventory efforts can be viewed at the following website:

http://egov.oregon.gov/ODF/STATE_FORESTS/Reports_and_Research.shtml

Modifications to the individual IP's can be viewed at:

http://egov.oregon.gov/ODF/STATE_FORESTS/District_Implementation_Plans.shtml

Clearcuts Proposed in the Tillamook 2009 AOP

The management strategies in the NWFMP envision the extent of regeneration stand structure across the landscape. This is defined more specifically in each District IP. Harvest units may be configured in a variety of shapes and sizes, including large clearcuts. The topography, vegetative condition, transportation network and logging systems of the operational areas selected for the 2009 AOP are better suited for larger harvest units. The FPA allows clearcuts up to 120 contiguous acres, but none of the harvest plans proposed in the 2009 AOP will have more than 120 contiguous acres in a harvest area.

Clearcut harvest is being used as a tool to re-establish stands in General and Desired Future Condition (DFC) Complex designation. Existing/Current stands may be shown on the IP map as DFC Complex but current conditions do not allow the stand to be managed for the structure. On page 4-48 of the NWFMP is defined conditions when regeneration harvests are appropriate for areas designated for a DFC of Complex structure. Some example stand conditions which are being clearcut harvested but designated as DFC Complex in the Tillamook District's 2009 AOP include:

1. Dense conifer stands that have missed the opportunity for density management (thinning)
2. Hardwood dominated stands
3. Off site seed source and/or impacts due to Swiss needle cast
4. Stand conditions resulting in low volume and high access costs

Thinning in Marbled Murrelet Management Areas

There is no known data supporting the conclusion that there is a decline of marbled murrelets on ODF lands. The Tillamook district has designated 29 Marbled Murrelet Management Areas (MMMA) totaling over 4700 acres. In the last five years six new MMMA were designated and others enlarged. The comprehensive survey program requires that all proposed timber sales are reviewed to assess habitat and determine if surveys are needed.

The Hansen Falls timber sale has been reviewed by the Area Biologist; he has completed a Preliminary Biological Assessment for the sale. The 'moderate risk' was assigned "due to uncertainties associated with the proposed logging system". More field work will be completed, boundaries will be refined and additional survey data will be compiled in a Final BA that the Area Biologist will complete prior to timber sale auction. The sale objective is to thin dense conifer and avoid areas where developing platform trees are found. The Final BA will draw upon the following information, direction, and restrictions:

1. Surveys – 2007 and 2008 to better understand what portions of MMMA is being utilized.
2. Area Biologist involvement – during planning, prescription development, sale layout, and operation monitoring.
3. Seasonal restrictions – No operations will take place April 1 – September 15
4. Operational restrictions – trees will be marked in some portions of sale, directional falling will be required, raising and lowering of yarding cables will be approved by Area Biologist.

Proposed Operations in the Kilchis Basin

The prescription for the Peak Out sale will retain approximately 14 green trees per acre in clumps and scattered and consisting of a variety of species and diameter classes, with overall objective of

creating a multi-layered conifer stand in the long term vision. A mixed conifer stand will be planted and natural regeneration is expected from the residual trees.

The alder greater than 10" DBH will be harvested and the pockets of conifer (hemlock and Douglas-fir) will be thinned using either a basal area or diameter limit prescription. The diameter-limit prescription would be used if the hemlock are too tall and have poor live crowns and height to diameter ratios in some areas. By cutting the trees with smaller diameters this will leave trees with larger diameter, which should be more windfirm. Cedar, spruce, and unmerchantable hardwood will be reserved in the stand.

There are several streams and high landslide hazard locations which will be buffered by no-treatment zones and will be utilized to maintain patches of a conifer/hardwood mix in clumps and stringers within the sale area. One stream has several high landslide hazard locations adjacent to it which will be incorporated into a large riparian buffer which will bisect the sale area. The prescription will result in hardwood/conifer buffers intersecting the sale area in conjunction with scattered patches of conifer 1 to 7 acres in size.

The Peak Out sale is not readily compatible to thinning for several reasons. First, the steep terrain is not conducive to extensive road building, meaning that viable logging systems must rely on ridgetop roads and cable yarding. Yet cable yarding also has its limitations. The length and shape of slopes and the availability of trees large enough for intermediate supports required for long spans dictate the viability of cable yarding as a means for thinning forest stands in steep mountainous terrain. Additionally, many of the trees in these stands have poor height-to-diameter ratios and a traditional thinning may not remove enough of these trees making the stand highly susceptible to wind related damage. These factors coupled with the reasons for clearcut prescriptions stated previously are the reason the modified clearcut prescription was chosen for this stand.

The Forest Management Plan states that the extent of regeneration structure should comprise between 5 and 15 percent of the forested landscape. The Kilchis basin has this requirement for its landscape design. The Fitch Creek operation in particular has been selected because:

- Currently, there is little Regeneration structure in the basin to provide for species dependent upon open habitats.
- Many of the areas within this operation were planted at the same time with no density management resulting in dense stands of small diameter trees. Stand growth has slowed to the point where it will not quickly respond to density management.
- As stated prior, due to terrain and stand conditions, these sale areas are operationally better suited for clearcutting compared to thinning.
- The operation is a first entry management in the Fitch Creek basin and developing the transportation system has very high access costs.

The analysis of High Landslide Hazard Location (HLHL) sites in the Kilchis basin sales was completed by the Area Geotechnical Specialist. His initial analysis concluded that there will be a need for additional field reconnaissance during sale layout to review landslide potential in the sale areas. The reviews are used to properly identify and buffer HLHL sites and streams so the operation does not increase the potential for landslides. The HLHL sites will retain existing trees on identified sites so when/if landslides occur they deliver wood considered beneficial to the stream system.

prescriptions for creating a DFC Complex stand, such as modified clearcut or retention cut, but because of stand issues they are the best way to move the present stand to DFC Complex.

When stands have missed the "window" for traditional density management (thinning) or are of a species composition and age at which thinning will do little to encourage the growth needed to create a complex stand then the options are: 1) do nothing and let the stand change slowly over time; 2) thin anyway to remove a little volume and value anticipating a small release to the residual stand; or 3) clearcut to remove a large amount of the overstory and allow a new cohort to be established in the understory.

The first option is for areas of difficult access or sensitive resources where it is either not economical or feasible to manage the stand for the DFC. The second option is used in sensitive areas like Threatened and Endangered species habitat areas where a dramatic change in the canopy could disturb the species of concern. This allows some removal of volume and value and enhances the stand for the wildlife and DFC conditions we are trying to achieve. The third option is used in areas where there are no sensitive species identified, usually hardwood stands or overly dense conifer stands. This option allows a new conifer cohort to be established, which is difficult to impossible to occur with the other two options, and it allows the removal of significant volume and value. The new stand can be set on a pathway to complex structure with future management.

As stated previously, the NWFMP recognizes certain conditions for which a regeneration harvest is an acceptable method of achieving complex structure goals. While it may not be intuitive, there are many stands on the Tillamook District that in their present condition can not be managed for Layered or Older Forest Structure. Where it does not conflict with other resource considerations, T&E species or HLHLs, starting the stand over is the preferred method.

Hopefully we have addressed adequately the concerns you expressed. Thank you again for your interest in State Forest lands. Please feel free to call or write anytime you have a concern or question. We are very appreciative of the time you took to comment on our 2009 AOP.

The public comments will be posted on the web site along with the ODF reply. Your letter will be put into a PDF file in which you will be only identified by your first name and initial of your last name. Your address, email and phone number will be blocked out. Organization letterhead will be retained. If you have any concerns regarding your comments being posted please contact:

Roger Welty, Planning Specialist
Oregon Department of Forestry
2600 State Street
Salem, OR 97310
503-945-7258, fax: 503-945-7376

Sincerely,

Andy White

Andy White
Acting District Forester
Forest Grove and Tillamook Districts