

2023 IMPLEMENTATION PLAN REVISIONS

Public Comment Summary

Public Involvement and Summary of Changes:

In order to engage with Oregonians, the Oregon Department of Forestry's (ODF) Implementation Plan revisions for the Astoria, Forest Grove, Klamath-Lake, North Cascade, Tillamook, West Oregon and Western Lane districts that had a 30-day public comment period, which began February 3, 2023. The public was notified via a statewide news release and subsequent media coverage, as well as emails to citizens and stakeholders on ODF's mailing lists, the ODF website, and posts on ODF's Facebook, Instagram & Twitter platforms. A public information workshop was also held on February 2, 2023. Public comment was accepted through the ODF website, email, and letters.

The purpose of the Public Comment Period was to provide an opportunity for the public to review the revised Implementation Plan, ask questions, make recommendations, and offer comments. As a public agency, ODF strives to operate in the best interest of Oregonians. We provide opportunities for public participation to assist us in securing the greatest permanent value from state forests for all Oregonians.

The following is a summary of the changes that have been made to the Implementation Plans based on the feedback that was received and new information that we have learned:

Changes in all Implementation Plans included:

- "Executive Summary"
 - Updated language to reflect adjustments made to ongoing policy work timelines
 - Provided additional clarity and language about considering new information from ongoing policy work.
 - Added language about the requirements outlined in the Coho Lawsuit Settlement Agreement.
- "Climate" – Updated language for clarity to include additional information about extreme weather events.
- "Planned Annual Harvest Objectives" - Added language about the requirements outlined in the Coho Lawsuit Settlement Agreement (Astoria, Forest Grove, and Tillamook Districts only) and added harvest and stand type language for clarity.
- "Young Stand Management" – Updated reforestation language to include additional information about seed sources and planting considerations.
- "Forest Health" – Updated silviculture activities to provide additional clarity.
- "Appendix A" – Updated take avoidance land T&E survey language to provide additional clarity.
- "Appendix C" – Updated references to include Coho Lawsuit Settlement Agreement (2023) (Astoria, Forest Grove, and Tillamook Districts only)
- "Appendix D" – Added this appendix which summarizes the Public Comments

Changes in only the Western Lane District – Southwest Unit Implementation Plan:

- “Planned Annual Harvest Objectives” and “Appendix A”– Updated the harvest range and language to be consistent with other Districts.

Summary of comments: In all, ODF received 48 individual written comments related to the Implementation Plan revisions for the Astoria, Forest Grove, Klamath-Lake, North Cascade, Tillamook, West Oregon and Western Lane districts. While there were many comments that specifically pertained to the Implementation Plan revisions, a large number of comments were out-of-scope as they related to other topics like the Habitat Conservation Plan, new Forest Management Plan, grants, legislation, etc. While these out-of-scope comments won’t be addressed in this document we did summarize them below. The following is a summary of comments received and agency responses, to these draft plans.

IMPLEMENTATION PLAN/HABITAT CONSERVATION PLAN COMMENTS

Comments related to the incorporation of the draft Habitat Conservation Plan requirements into the Implementation Plan revisions included general comments of support or opposition as well as recommendations. Commenters recommend:

- *Extending current Implementation Plans until the Habitat Conservation Plan is adopted instead of approving the revised Implementation Plans.*
- *Delaying implementation of the Habitat Conservation Plan until the new Forest Management Plan is finalized.*
- *Implementing the Habitat Conservation Plan requirements and provisions of the Incidental Take Permit only when they are approved and in place.*
- *Developing transitional implementation plans for Fiscal Year 24-25 that continue business as usual.*
- *Delaying implementation of the draft Habitat Conservation Plan to give ODF, counties, and industry time to plan for possible reduced harvest going forward.*
- *Support ODF applying Habitat Conservation Areas and Riparian Conservation Areas into Implementation Plans revisions which will help create more complex forests, provide habitat for many species, make forests less prone to wildfire, and older stands that store more carbon than those managed on a 40-year rotation.*
- *Extending current Implementation Plans should not increase the timeline to draft Fiscal Year 2024 Annual Operations Plans just add alternate sales or primaries from previous fiscal years.*
- *Removing Habitat Conservation Area restrictions on where regeneration harvest sales can occur until a Habitat Conservation Plan is finalized.*
- *Removing the Habitat Conservation Plan requirement that a minimum of 40% estimated spotted owl dispersal habitat will be maintained outside of Habitat Conservation Areas from Implementation Plans.*
- *Using Habitat Conservation Plan Alternative 3 for adequate protection of water quality and aquatic resources in the Implementation Plans.*
- *Removing limits on thinning and clearcut harvesting in Habitat Conservation Areas until Board of Forestry approves a Forest Management Plan designating Habitat Conservation Areas.*

- *Excluding any language related to draft Habitat Conservation Plan in the guiding documents for any of ODF managed lands until the Habitat Conservation Plan has been finalized.*
- *Implementing conservation measures from the draft Habitat Conservation Plan consistent with the wildlife goals and Desired Future Condition Complex ranges outlined in the current Forest Management Plan.*
- *Using a transitional approach that implement some conservation measures of the draft Habitat Conservation Plan that truly align with the current Forest Management Plan instead of combining all conservation measures and overemphasizing thinning prescriptions.*
- *Implementing Habitat Conservation Area strategies in areas designated as Desired Future Condition Complex.*
- *Exclude draft Habitat Conservation Plan management prescriptions in Implementation Plans until Habitat Conservation Plan is adopted and incidental take permits are issued.*
- *Incorporating the approved Private Forest Accord since all major environmental groups, timber stakeholders, and the State of Oregon can agree that the Private Forest Accord meets all Endangered Species Act requirements, and all water quality and environmental goals and all economic goals that the Board of Forestry is expected to meet and balance.*

More general comments, which did not include recommendations, include:

- *Commendation for incorporating best management practices in the proposed Habitat Conservation Plan and Implementation Plans revisions.*
- *Supporting incorporation of draft Habitat Conservation Plan requirements into Implementation Plans revisions.*
- *Perspective that the revised Implementation Plans bloat areas designated as Desired Future Condition complex by implementing conservation strategies designed to meet other goals not included in the current Forest Management Plan.*
- *Concern that the Implementation Plans revisions do not achieve the original balance of Greatest Permanent Value in the current Forest Management Plan because of the overlap of the current Forest Management Plan requirements and the draft Habitat Conservation Plan requirements.*
- *Perspective that New Implementation Plans fail to balance ecosystem services and instead focuses on conservation measures due to overlapping DRAFT Habitat Conservation Plan strategies on top of current Forest Management Plan objectives.*
- *Perspective that the Habitat Conservation Plan restrictions are compounding the impacts of current Forest Management Plan restrictions (Desired Future Condition, Terrestrial Anchor Sites, Aquatic Anchors), which according to Implementation Plans will continue even after a Habitat Conservation Plan is adopted.*
- *Perspective that Districts will be operating under unnecessarily restrictive implementation plans if they move forward with implementation of the draft Habitat Conservation Plan.*

Response:

At the direction of the Board of Forestry, ODF is continuing the development of a draft Western Oregon State Forests Habitat Conservation Plan and new Forest Management Plan for Western Oregon State Forests. At the time of developing the revised Implementation Plans, the Habitat Conservation Plan is a

formal public draft document with an accompanying draft Environmental Impact Statement in the federal National Environmental Policy Act process. Finalization of the Environmental Impact Statement and Biological Opinions, and issuance of Incidental Take Permits is expected to occur within Fiscal Year 2024. The current draft of the Habitat Conservation Plan states that implementation will begin with the Fiscal Year 24 Annual Operations Plan. There were several comments providing suggestions for partial implementation of the Habitat Conservation Plan requirements or adjustments to the requirements but in order to continue this process these Implementation Plans must be revised to include all of the components of the draft Habitat Conservation Plan in order to cover the expected Habitat Conservation Plan approval timeline. As this process evolves ODF will evaluate new information or changes in direction after they occur to determine if adjustments need to be made.

Forest Management Plan/Habitat Conservation Plan Balance: Given the Board of Forestry direction, even in light of the questions and the dialog that is occurring, and the timing requirements outlined in the draft Habitat Conservation Plan there is a transition period where ODF may be issued Incidental Take Permits without an approved new Forest Management Plan. This means that we need to work under current Forest Management Plan until a new Forest Management Plan has been approved including the requirements around Terrestrial Anchors, Aquatic Anchors, and Desired Future Condition. The current Forest Management Plan gives flexibility to manage above the minimum requirements outlined in the plan and provide discretion to exceed these requirements to achieve other goals. There have been many examples of current Forest Management Plan overlap with other requirements since the plan adoption, such as the Forest Practices Act rule overlap, species of concern requirements, and litigation settlement requirements. In this case it means the additional Habitat Conservation Plan requirements needed to follow the Board of Forestry direction and honor the Habitat Conservation Plan process. This overlap of rules will be temporary during this transition period and will be resolved with the adoption of a new Forest Management Plan. As the Habitat Conservation Plan and new Forest Management Plan process evolves, ODF will evaluate new information or changes in direction after they occur to determine if adjustments need to be made.

Utilizing the Private Forest Accord: The Private Forest Accord and the State Forests Habitat Conservation Plan are two separate Habitat Conservation Plan processes. The Private Forest Accord process excludes State Forests from being an applicant for that Habitat Conservation Plan and any Incidental Take Permits that may result. This means that State Forests could not implement the Private Forest Accord rules to meet Endangered Species Act requirements. Another major difference is that the Private Forest Accord only covers certain fish and amphibian species while the State Forest Habitat Conservation Plan covers several fish and amphibian species but also includes additional species of birds and mammals. The Private Forest Accord resulted in a new set of Forest Practices Act rules prior to completion of its related Habitat Conservation Plan and issuance of Incidental Take Permits. This is similar to the process that State Forest is using during this transition period by implementing the State Forest draft Habitat Conservation Plan requirements while the State Forest Habitat Conservation Plan process is being completed.

HARVEST LEVELS COMMENTS

Comments related to State Forest timber harvest levels included:

- *Keep harvest levels at the current Implementation Plan levels. Don't lower the harvest levels.*
- *Revise Implementation Plans to bring harvest levels closer to current levels.*

- *Several comments expressing concern that businesses and mills will close, contract firefighting and logging resources won't be available because of reduced harvest levels.*
- *One noted that Implementation Plans fail to accurately follow either plan and significantly reduce annual harvest objectives that will leave critical gaps in Oregon's forest manufacturing capacity and operating workforce.*
- *Several comments concerned the decreases in Annual Harvest Objective for the majority of the Draft Implementation Plans when Habitat Conservation Plan and new Forest Management Plan are not approved.*
- *Concern that required workforce won't be available for the Department to achieve its conservation goals alongside its economic goals.*
- *Proposed harvest reductions could be closer to 50% depending on proposed stands taken out of production.*
- *One commenter noted that the harvest reductions mean roughly a 30% reduction in annual harvest and amounts to an approximate decrease of \$80 million dollars in revenue over two years resulting in a \$30 million budget shortfall for ODF and \$50 million budget shortfall for counties and local governments and has the potential to adversely impact over 700 timber-related jobs in rural communities.*
- *Reduced harvest levels from State Forests combined with declining supply from highly regulated domestic producers will require imported wood products to meet demand.*
- *Reduction in harvest combined with Oregon's new emission requirements will make it hard for trucking companies to stay in business.*
- *State Forest reductions combined with United States Forest Service harvest level reductions, decreasing market due to 2020 fires, and increased Private Forest Accord harvest restrictions will harm local companies and families and lead to lumber being imported when we should be sustainably supplying the market locally.*

Harvest Levels Response:

These Implementation Plans seek to balance the agency's legal obligation to manage state forests for economic, environmental, and social values while working through potential policy changes in the face of a broad range of perspectives. In doing so, harvest levels will be lower for the next two to three years as we work through the Habitat Conservation Plan and new Forest Management Plan process, await final direction from the Board while honoring commitments made in the Habitat Conservation Plan as to not affect the calculations of "take" during the Environmental Impact Statement and continue to implement management strategies in the current Forest Management Plan to ensure future sustainability under these rules and policies. These revisions incorporate new data and information on forest resources and incorporate both the Forest Management Plan and the draft Habitat Conservation Plan requirements during this transition period while this work is being completed. This has required harvest levels to be adjusted to ensure future sustainability under these rules and policies. The harvest levels are lower than what we have been operating on in previous years and represent a range of 19% to 27% in total volume reductions averaged across all the districts from the current Implementation Plan targets. The actual harvest levels and specific operations will be identified in the Fiscal Year 24 and Fiscal Year 25 Annual Operation Plans. Currently State Forests has approximately 325 million board feet of timber under contract and an additional 330 to 365 million board feet that will be added to the local

market over the next two years. As ODF works through the Habitat Conservation Plan and new Forest Management Plan process new information or changes in direction will be evaluated after they occur to determine if adjustments need to be made.

FOREST MANAGEMENT COMMENTS

Comments related to Forest Management on state forests include:

- *Regeneration harvests should be avoided in Habitat Conservation Areas especially harvest of alder stands within Habitat Conservation Areas should be avoided at all costs as alder has value in fixing nitrogen and providing foraging habitat.*
- *Partial cuts in the Habitat Conservation Areas must be limited and only applied where there are clear conservation objectives for developing complex forest conditions.*
- *Clearcut timber harvest on steep slopes above salmon-bearing streams must be avoided or risk violating the Endangered Species Act.*
- *Opposed to planting genetically modified trees.*
- *Consider planting more cedar because it is higher quality wood, doesn't rot away and has more value.*
- *Current harvest methods not only remove trees but also clear all native and nurse trees, understory plants, and then are sprayed with chemicals.*

Forest Management Response:

Partial Cut/Thinnings in Habitat Conservation Areas: Some partial cuts for improving wildlife habitat consistent with the long-term goals of the Habitat Conservation Plan will occur within the Habitat Conservation Areas. As areas for habitat improvement are identified, the partial cut prescription for these areas will be developed in collaboration with ODF biologists and foresters. This is done in partnership as the biologists identify what habitat characteristics they are looking for in the stands and the foresters help identify prescriptions that would lead to those desired characteristics. Partial cutting within Habitat Conservation Areas will average approximately 1,500 acres per year across the districts as per the Habitat Conservation Plan. During the time frame of these Implementation Plans, these partial cut prescriptions will align with the current NW & SW Forest Management Plans, Habitat Conservation Plan and Implementation Plans.

Regeneration in Habitat Conservation Areas: Hardwood species have value for wildlife habitat, however, large expanses of red alder dominant stands with little conifer component are unlikely to develop into suitable or highly suitable habitat for some covered species within the Habitat Conservation Areas. There are approximately 50,000 acres of hardwood dominated stands within the Habitat Conservation Areas. To assist in meeting the biological goals and objectives within the Habitat Conservation Plan for the terrestrial covered species, stand management in the form of modified clearcut or retention cut may occur in approximately 30% of red alder-dominant stands within Habitat Conservation Areas over the first 30 years of the Habitat Conservation Plan implementation. Within these managed stands, existing conifers may be retained where operationally feasible, and some hardwoods may also be retained during harvest. All trees regardless of species are maintained within

Riparian Conservation Areas. Many hardwood-dominated stands within the Habitat Conservation Areas will remain unmanaged.

There are approximately 46,000 acres of stands within Habitat Conservation Areas containing Douglas-fir trees that are severely infected with Swiss needle cast. Swiss needle cast is a native disease of Douglas-fir that affects trees of all ages and causes premature loss of needles, especially in the upper crown, which reduces tree growth and vigor across affected acres. The focus of management in a subset (33%) of these infected stands within Habitat Conservation Areas over the first 30 years of the permit term will be to replace stands that are stunted by Swiss needle cast that are not otherwise likely to become high quality habitat for covered species. These managed areas will be replanted with a species mix that will grow into more suitable habitat for the covered species. Swiss needle cast regeneration prescriptions may include the retention of other conifer species and hardwood species that are unaffected by the disease. No trees regardless of Swiss needle cast infection will be removed from Riparian Conservation Areas. Many Swiss needle cast infected stands within the Habitat Conservation Areas will remain unmanaged.

Green Tree Retention: Green trees are retained within each modified clearcut unit. Arrangements of retained green trees include; scattered individual trees, clumps of trees, and trees concentrated in and adjacent to riparian management areas, inner gorge areas or headwalls. The final decision on the location and arrangement of the green trees is made while the timber sale is being laid out to incorporate information on potential minor tree species, unique stand features, steep slopes, visual considerations, reforestation considerations, logging costs, etc.

Steep Slopes: The Forest Management Plans and associated policies are designed to ensure forest resources are protected and that natural processes fundamental to healthy forests continue. Landslides are important natural geological processes, which introduce large wood and gravel into the stream network. Large wood and gravel inputs are critical to fish habitat, spawning and rearing.

Strategies in place within the forest management plans and Habitat Conservation Plan provide robust aquatic and riparian buffers that include additional protection measures and tree retention for areas of potential unstable slopes such as inner gorges, initiation sites and their associated potential debris flow track reaches and high energy seasonal streams. ODF strives to complete geotechnical reviews prior to finalizing district annual operation plans, however, some field consultations can't be completed by then or are more effectively done during sale layout. Further unstable slopes noted by foresters are addressed prior to finalizing leave tree strategies and all geotechnical concerns are addressed prior to a timber sale being sold.

Young Stand Management: ODF does not plant genetically modified trees. ODF plants native tree species that are grown from seed that is considered to be suited to future conditions. This seed is produced from traditional crossbreeding of trees from a variety of seed zones to make them resilient to current disease and future climate conditions. Individual reforestation strategies are developed for harvest units. These strategies take into consideration elevation, aspect, root disease, desired future stand conditions, and anticipated drier, hotter future conditions resulting from climate change. These strategies include site preparation, species, stock type and tree spacing tailored to each unit. Cedar is included as a species that may be planted on state forest in areas that are well suited to its growth.

Herbicides: Harvest sites by law must be replanted, and ODF strives to use the minimum amount of herbicides necessary to achieve reforestation success. After harvesting, vegetation that competes with newly planted trees rapidly re-colonizes harvest units. Herbicides are an effective tool to temporarily reduce competing vegetation which enables newly planted seedlings to establish and thrive, so there will be future forests for all Oregonians as well as the wildlife that depend on them. When using herbicides, it is done in accordance with the product label and all applicable rules and laws. Contractors hired to apply herbicides on ODF lands are closely monitored by ODF contract administrators (who are also licensed applicators). ODF uses ground-based applications where it is practical and does not unduly increase costs or present physical hazards to crews working on steep slopes. ODF encourages all concerned citizens to sign up in FERNS for notifications, as this is the easiest way to stay informed on upcoming operations.

INSECT AND DISEASE COMMENTS

Comment received related to insect and disease management:

- *Support harvesting in order to reduce insect infestations.*

Insect and Disease Response:

Most insect, disease and abiotic forest threats are best handled through prevention via management for forest resilience. Healthy trees are well-defended and able to resist or tolerate these forest threats. Silvicultural methods will be used to enhance tree and stand resiliency to ensure forest health and sustainability. Silvicultural activities that may be utilized to address forest stressors include:

- Planting native species in locations most suitable for their growth, accounting for changing temperature and precipitation;
- Widening spacing to reduce competition for soil moisture and mitigate reduced or inconsistent precipitation;
- Increasing tree species diversity to inhibit the spread of host-specific insects and diseases;
- Avoiding planting host tree species in known root disease pockets;
- Utilizing preventive techniques during operations to prevent the spread of invasive weeds and diseases; and
- Removing marketable timber in a timely manner to avoid defect-causing agents such as wood boring beetles and fungi.

WILDLIFE COMMENTS

Themes on wildlife include:

- *One commenter suggested that continuing threatened and endangered species surveys after the Incidental Take Permits are issued is unnecessary.*
- *Threatened and Endangered surveys should be ended once a Habitat Conservation Plan is adopted.*
- *Take avoidance strategies in the current Forest Management Plan should not continue after a Habitat Conservation Plan is adopted.*

Wildlife Response:

Upcoming operations will be surveyed for Threatened and Endangered species until such time as Incidental Take Permits are issued and implemented by ODF. Forest managers will evaluate and

determine the transition plan for the Threatened and Endangered survey program based on anticipated timing of the Incidental Take Permits issuance and contract commitments. The strategy surrounding surveys and take avoidance strategies is found in Appendix A – District Harvest Modeling Analysis and refers to modeling. The model is run in periods of 5 years so this language was acknowledging that take avoidance strategies would need to be applied for the first couple of years on the ground. This language in Appendix A will be adjusted for clarity.

STREAMS COMMENTS

Comments around stream health, protection and enhancement include:

- *Encourage State Forests to protect drinking water coming from healthy watersheds.*
- *Consider fish habitat protection and enhancement along Gales Creek and its tributaries.*
- *Utilize one set of riparian/aquatic strategies at a time in these Implementation Plans.*
- *Encourage ODF to designate Tualatin tributaries such as Gales Creek as an Aquatic Anchor Watershed and Terrestrial Anchors.*
- *Thinning and other timber harvest operations should be avoided in Riparian Conservation Areas allowing more natural processes to run, devoid of human disturbance and providing habitats and buffers from landslide threats.*

Streams Response:

Stream Buffers: Strategies within the Forest Management Plans and the Habitat Conservation Plan are designed to maintain or restore properly functioning aquatic systems. Streams will be protected by applying no harvest Riparian Conservation Areas from the draft Habitat Conservation Plan. The only exceptions to this is within the designated Aquatic Anchors where no harvest zones will be extended out to 50 feet when regeneration harvesting on small perennial, debris flow-prone, and high-energy non-fish streams as outlined in the State Forest Division Species of Concern Policy; or when a small, non-fish stream is designated as Type D or within process protection zones, then the buffers for those reaches detailed within Oregon Forest Practices Act may be applied.

Stream Enhancement: State Forests has been committed to implementing stream enhancement work on ODF-managed lands for more than two decades as a partner in the Oregon Plan for Salmon and Watersheds and in partnership with Oregon Department of Fish and Wildlife, local partners, and adjacent land managers. Stream enhancement, fish passage, and Riparian Conservation Area standards are designed to collectively improve processes and function of aquatic ecosystems over time, and ultimately benefit resident and anadromous aquatic-dependent species. Over the last 25 years, ODF has implemented many types of projects including over 200 in-stream projects across State Forests (an average of 8 projects per year) and provided over 7,618 trees (an average of over 300 trees per year) resulting in over 47 million dollars of in-kind contributions. Since 2009, ODF has done several stream enhancement projects in partnership with Oregon Department of Fish and Wildlife, Oregon Watershed Enhancement Board, the Tualatin River Watershed Council and adjacent land managers along Gales Creek and its tributaries where coho salmon were present. This includes placing 294 logs within the streams and installing 2 stream crossings that allow for the passage of fish. ODF will continue to look for additional stream enhancement opportunities with local partners in the future.

Aquatic Anchors and Terrestrial Anchor Sites: Aquatic Anchors are 6th field watersheds that were identified as important to aquatic species by the Aquatic and Riparian Specialist for ODF and Aquatic Specialists for Oregon Department of Fish and Wildlife. The watersheds selected support populations of salmonid and aquatic amphibian species of concern; contain high quality aquatic habitat for salmonids and/or aquatic amphibians; and contain an adequate proportion of state forest ownership to provide a reasonable likelihood that state forests management strategies will have a meaningful influence on watershed condition. Terrestrial Anchor Site locations were chosen collaboratively by biologists from ODF and Oregon Department of Fish and Wildlife using data on the presence of species of concern, the habitat needs of those species while considering the current stand conditions and the likelihood of achieving complex stand structure in a timely manner. The Tualatin tributaries did not meet the criteria mentioned or were a lower priority for location for both the Aquatic Anchors and Terrestrial Anchor Sites at the time the designations were determined.

CARBON/CLIMATE COMMENTS

Climate change and the appropriate role of state forests continues to be a topic of concern. Comments received in this theme include:

- *Encourage ODF to update draft Implementation Plan climate assessment under the physical elements to include information regarding the effects of climate change on forest lands.*
- *Several commenters noted that there is no mention of the approved Climate Change and Carbon Plan in the Draft Implementation Plan.*
- *Recommendation to include proposed actions to begin meeting the goals of the Climate Change and Carbon Plan to increase carbon storage and sequestration in the Tillamook State Forest.*
- *Consider applying a 21-inch tree harvest restriction to preserve the old growth and mature trees and to store and sequester carbon to help mitigate climate change.*
- *One commenter noted that thinning results in a substantial net loss of forest carbon storage, and a net increase in carbon emissions that can substantially exceed those of wildfire emissions.*
- *Recommendation to promote climate smart forestry practices (e.g., variable density thinning, afforestation, longer timber harvest rotations, limiting the diameter of harvested trees, etc.) all of which allow timber harvesting with minimal impacts on climate change.*
- *Recommend best way to store carbon long term is in living trees which sequester additional carbon as it grows.*

Carbon/Climate Response: Climate change and carbon and overall forest management strategies are being actively addressed as part of the new Western Oregon State Forests Management Plan and associated Implementation Plans as per the Oregon Department of Forestry Climate Change and Carbon Plan. The Western Oregon State Forests Management Plan and Implementation Plans will be completed in 2024 and 2025 respectively.

While the current Forest Management Plans and these Revised Implementation Plans don't address carbon or climate change directly, the implementation of these plans will result in a variety of forest stand conditions that maintain healthy, multi-species, vigorously growing forests, which will contribute to resilient healthy forests into the future. This is consistent with strategies within the Climate Change and Carbon Plan. Legacy structures retained within harvest areas will continue to store carbon while the

new seedlings regenerating around these structures will accumulate carbon. Areas of the forest that have a desired future condition of Layered or Older Forest Structure, riparian areas, no harvest wildlife areas, forested areas that are inoperable, etc. provide carbon storage throughout large portions of the landscape.

Forest health strategies are addressed on a site-specific basis when the reforestation plan is developed for planting and other young stand management treatments. Site specific prescriptions consider target species, aspect, elevation, soil types, Swiss needle cast risk where applicable, *Phellinus weirii* (laminated root rot) presence, required stocking guidelines, natural advanced regeneration, the desired future condition of the stand and anticipated drier, hotter future conditions resulting from climate change. This will provide for a diverse, healthy, productive, and sustainable forest ecosystem over time that will be more resilient to change.

Old Growth: The Northwest and Southwest State Forests Management Plan defines Old Growth as “Typical characteristics of old growth include: a moderate to high canopy closure; a patchy, multilayered, multispecies canopy with trees of several age classes, but dominated by large overstory trees with a high incidence of large living trees, some with broken tops and other indications of old and decaying wood; numerous large, standing dead trees (snags); heavy accumulations of down woody debris; and the presence of species and functional processes that are representative of the potential natural community. In western Oregon, old-growth characteristics begin to appear in unmanaged forests at 175-250 years of age.”

Existing old growth trees are generally scattered individual trees or are occasionally small isolated patches. The Northwest and Southwest State Forests Management Plans specifically reserve these remnant trees from harvest.

RECREATION COMMENTS

Comments received around public engagement in recreation development include:

- *Two commenters recommend engaging local residents in the development of a new trailhead, trails, and/or trail system at the far north end of the Tillamook State Forest near Highway 53 when considering development of new recreation areas.*

Recreation Response:

The Oregon Department of Forestry is looking forward to engaging with local communities and trail use clubs and organizations during the development of recreation management plans and trail system plans for state forests in northwest Oregon. We will be reaching out to our partners and local communities as we begin to shape the process for development of these important plans. As stated in the draft Implementation Plan, the recreation management and trail system plans will define distribution of recreation and trail opportunities on state forest land. As we embark on this planning work in collaboration with our community partners, one of our goals will be to enhance trail system diversity, distribution, and connectivity and in the process create, where we can, recreation opportunities, particularly trail opportunities, close to home for many that live in the rural communities that surround state forests.

ROADS COMMENTS

Comments around public access and new road construction include:

- *One commenter asked why a State Forest road is closed to public after a new bridge paid by public was put in after Prouty creek culvert washed out in 2017.*
- *One commenter stated they have seen roads gated off and road quality decrease due to funding shortfalls cutting off access to 500 acres in Benton County.*
- *Another commenter suggested that stream crossings should be avoided and ODF must minimize the use and impacts of culverts, which can be detrimental to fish migration and habitat.*
- *Comment that road building has expanded on State Forests in the past 10 years and recommended that road-building on steep slopes above salmon-bearing streams must be avoided or risk violating the Endangered Species Act.*
- *New road building should be prohibited within the Riparian Conservation Areas and Habitat Conservation Areas.*

Roads Response:

State Forests are managed to support public access while providing for community safety, environmental benefits, protection of state and private assets, and wildfire prevention. Roads are evaluated for their public access benefits and costs during the annual operations planning process. Some roads are closed and vacated to reduce the maintenance costs and to minimize impacts to the environment. These areas remain open for walk-in use. The Department retains the option of gating roads if vandalism, neighbor concerns, or excessive road damage from public use becomes a problem in particular areas. The public may still access these areas on foot, bicycle or horseback.

In the case of the road closure for access to the Tillamook State Forest after a new bridge was installed on Prouty Creek, the road was temporarily closed until the bridge was replaced. This particular area of the Tillamook State Forest is accessed by traveling through privately owned lands. While the bridge was being replaced, the current private landowner decided to limit access through their property with a gate as is their right. ODF has access beyond the gate via an easement to allow for forest management and fire suppression. The easement does not allow for public access. The area behind the gate is still accessible to the public albeit through a different access point on the forest.

A well-maintained road system is necessary for a working forest and to provide the recreational access Oregonians increasingly demand. Road systems also provide access for fire response. All road construction, improvement, maintenance and vacating will follow best management practices in the State Forest Roads Manual and meet goals and objectives as outlined in the Habitat Conservation Plan. ODF evaluates each timber sale and strives to build the minimum number of roads required, except where ODF has identified road systems that can be moved away from existing streams to mitigate hydrological issues. This may result in more road miles, but relocating roads away from the stream network is beneficial for watershed processes. ODF tries to limit the number of stream crossings where possible when building new roads. Where stream crossings are unavoidable, new and replacement stream crossings will be designed to meet National Oceanic and Atmospheric Administration Fisheries (2022) passage criteria to maintain passage for covered fish species where applicable and follow best management practices outlined in the State Forest Roads Manual. All planned road construction is reviewed by the Geotechnical specialist to ensure that new roads are located in stable locations to provide the best protection to natural resources while meeting the objective of the road. Discussions are held regarding the long-term use of the road by ODF Staff for reforestation and future management,

and whether a road needs to be surfaced or if it can be left unsurfaced. Financial costs of the construction and long-term maintenance are considered as well as potential impact to sale operations, anticipated closures related to weather, and long-term impact to wildlife and recreation.

Roads in Riparian Conservation Areas/Habitat Conservation Areas: Minimal roads will be built within Habitat Conservation Areas as needed in conjunction with management activities to improve habitat. Roads will be located away from streams, wetlands, unstable areas, and sensitive resource sites. Road development within the Riparian Conservation Areas will only occur when other alternatives are not operationally/economically feasible.

MODELING COMMENTS

Concern around modeling outcomes used to inform the annual harvest objective include:

- *One commenter recommended reviewing data used in harvest model based on concerns from some field staff.*

Modeling Response:

District staff reviewed the modeling data and expressed concerns regarding the growth and yield outputs from the model. The modeled outcomes were then adjusted to address the District's concerns. The State Forest Division is currently working with a consultant from Mason, Bruce and Girard to see if the growth and yield data can be calibrated to more closely align with expected state forests outputs. This calibrated data will be used in future modeling efforts including the Western Oregon State Forests Management Plan implementing the Habitat Conservation Plan modeling to be presented to the Board of Forestry in September.

OUT OF SCOPE COMMENTS

Comments that were out of scope that related to the draft Habitat Conservation Plan, new Forest Management Plan, grants, legislation, and other topics:

- *Several commenters support ODF's commitment to Habitat Conservation Plan*
- *Keep current Habitat Conservation Plan process on track and don't redesign.*
- *Opposed to the Habitat Conservation Plan and the negative effects to rural Oregonians.*
- *Suggest removing the thinning acre limits in Habitat Conservation Areas in the draft Habitat Conservation Plan.*
- *Several comments recommending revisiting State Forests Habitat Conservation Plan to ensure conservation, production, sustainability, and supports rural Oregonians.*
- *BOF should set the minimum board foot harvest per year to provide clarity.*
- *Recommends adopting Private Forest Accord and rejecting proposed Habitat Conservation Plan that protects more than necessary to meet Endangered Species Act requirements and all water quality and environmental goals.*
- *Board of Forestry should direct ODF staff to prepare a revised Habitat Conservation Plan to get increase harvests levels to the levels proposed at the beginning of this process.*
- *Proposed Habitat Conservation Plan arbitrarily sets aside large areas of timber into non-production.*

- *Recommend ODF quickly redesign Habitat Conservation Plan that will ensure sustained harvests that are in line with the current 10-year average harvest volume of 250 million board feet.*
- *Habitat Conservation Plan was developed without proven environmental models that guarantee endangered species would actually be protected.*
- *Disagrees with large forest set asides to protect non-existent northern spotted owl sites on Clatsop County State Forests. The two current Northern Spotted Owl circles in Clatsop County State Forests have been vacant for years and could be scheduled to close soon.*
- *Noted that changing the flow of harvest volume, updating growth and yield tables, or increasing thinning harvests in the Habitat Conservation Areas won't be enough, only way to increase harvest is to reduce acres in the Habitat Conservation Areas and eliminate management restrictions on those lands to be managed outside of the Habitat Conservation Areas.*
- *One commenter noted that the draft Habitat Conservation Plan was drafted behind closed doors and is a high-cost initiative.*
- *Another commenter noted that there are more cost-effective measures the state could take to support sensitive wildlife.*
- *Other commenters recommended additional model runs showing shorter & longer rotations, new Private Forest Accord rules and scenarios around current sustainable harvest levels to inform the Board of Forestry around tradeoffs.*
- *The current draft Habitat Conservation Plan sets aside more acres than needed when considering the cumulative impacts globally by requiring the imports to replace sustainably produced Oregon products.*
- *Concern not enough is being done to protect the logging industry.*
- *People's livelihoods should come before an endangered species.*
- *Another suggested that federal government could financially support Oregon to prevent clearcutting the temperate rainforest that is the most efficient, self-sustaining weapon against climate change like it does other countries.*
- *ODF timber contributes to the marketplace that generates stable revenue for the counties and helps maintain the mill infrastructure and jobs are a key piece of the economic stability in small communities.*
- *Noted that the reduction in harvest as a result of the Habitat Conservation Plan is unreasonable compared to the level it was claimed to achieve with the draft Habitat Conservation Plan and what the draft Environmental Impact Statement projected.*
- *I oppose Senate Bill 803. I oppose House Bill 3158. I oppose Senate Bill 85. I wholly support Senate Bill 498 and Senate Bill 795.*
- *Request for grant to help steward 10 acres of private forest in Southwest Oregon.*
- *Oregon can't afford to shut down our state forests.*
- *Manage forests by clearing underbrush and allow sufficient timber harvest to house citizens and support counties.*
- *Taxpayers need proper forest management, proper road maintenance, proper harvested forests that actually proved more wildlife.*
- *Support State Forests protecting endangered species.*
- *One commenter noted that saving spotted owls and other species seems noble but questioned what animals survive forest fires.*

- *One commenter noted that Barred Owls are currently out-competing Spotted Owls. Large set-asides will not make the Spotted Owls more competitive and thus are not effective.*
- *One commenter noted not seeing proof of significant endangered species improvement on federal forests due large timber set-asides since 1999 so unlikely to see different results on State Forests.*
- *One commenter noted that Oregonians have the responsibility to sustainably manage all forest lands to meet goals of the global environment and not transfer our environmental responsibility to countries with far less strict policies.*
- *Some wilderness is fine but not too much.*
- *Consideration must be given to using our temperate rainforests to combat climate change Recommends deeding or selling State Forests to private enterprise.*
- *Environmental groups should not have more say than people who live in the area.*
- *ODF lands should be managed for maximum timber production while providing recreational opportunities and fish and wildlife habitat as it is currently.*
- *The Habitat Conservation Plan requirement that a minimum of 40% estimated spotted owl dispersal habitat will be maintained outside of Habitat Conservation Areas should be removed from draft Habitat Conservation Plan.*
- *Federal agencies have not required ODF to set aside more than half of the productive land base to achieve the conservation goals it desires.*
- *Forest workers are not prepared for the proposed diesel ban.*
- *Growing of inventory while maintaining the harvest level will add more habitat to sensitive species over time improving the outlook for all objectives the Habitat Conservation Plan will be addressing.*
- *Harvested lands provide good food sources for wildlife.*
- *One commenter noted complex forests provide a variety of trees, shrubs, soil microorganisms, pollinators, birds, and wildlife and are important for carbon sinks, erosion control, moisture release, drinking water, and providing cold water for endangered fish and wildlife.*
- *Several commenters noted that limiting harvest would lead to increase of wildfires.*
- *One commenter recommended that proper wildland fire protection is needed.*
- *One commenter noted that large set asides of timberland on Federal Forests in Oregon, Washington, and California now burn more proportionally each year, causing larger and immediate carbon gas releases and cost billions of dollars to fight forest fires over the years.*
- *Recommendation that State and Private forests should be managed and utilized to include carbon sequestering forest products.*
- *One commenter noted that State Forests should serve as a carbon sink as that is one of the greatest permanent values.*
- *One commenter proposed revising the current agreement and unhook dependence on timber harvests to supply their funding for schools and other services.*
- *Supports managing State Forests for greatest value including minimizing wildfire and other catastrophic events.*

