



"STEWARDSHIP IN FORESTRY"

Oregon Department of Forestry
State Forests Program
Northwest Oregon Area

State Forest Advisory Committee
Review of the Fiscal Year 2009 Annual Operations Plans
Committee Questions and the State Forest Program's Responses

List of Relevant Acronyms and Abbreviations

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

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Introduction

The following are questions taken directly from the meeting minutes and notes of the April 4th, 2008 meeting with the State Forest Advisory Committee (SFAC), when they provided feedback and comment of their review of the FY 09 Annual Operation Plans (AOPs). The committee's comments were based upon their review of the Northwest Oregon Area's 2009 AOP Summary, which condenses all of the operations planned on each of the five Districts into a single document.

Committee members provided feedback verbally during facilitated group breakout sessions and roundtable discussions. Their comments have been recorded in the meeting minutes and are posted on the ODF's website at:

http://egov.oregon.gov/ODF/STATE_FORESTS/State_Forests_Advisory_Committee.shtml#Committee_Membership

The questions and comments addressed here are those from the minutes considered to be important as feedback for the public record. As with comments from the general public, a response from the ODF addresses the concerns expressed and also becomes part of the public record. The purpose of addressing these comments in this context is: 1) so that the committee's feedback is available to the general public, 2) their review of the AOP is more widely known, 3) to more effectively achieve FMP goals relevant to public involvement, and 4) so that ODF's responses to the committee can help inform the public further about the FMP, forest systems, and forest stewardship.

The comments addressed here are divided into three categories. Those that are programmatic, and express concerns about higher level strategies and planning processes, those that are specific to a particular resource, and those that are more specific to an individual District. The comments and questions from the SFAC are highlighted in yellow.

Programmatic- and Planning-Level Comments

Question/Comment(s) #1:

- County governments have revenue expectation from State Forests. FMP must balance and accomplish this revenue while also maintaining environmental objectives. This is the social contract to actively manage the forests.
- Policies and standards for habitat, species-of-concern, and water provide for an inequitable pre-eminence over social and economic outputs.

ODF Response – Performance measures have been developed for the Board of Forestry (BOF) as a means for determining if the balance of economic, environmental, and social objectives is being achieved by the State Forest program. As the Board evaluates the program's success at achieving performance measure targets, there may be resultant adjustments, refinements, or enhancements in order to strike or maintain balance.

Currently, analyses are underway to determine for the BOF if the performance measures related to economic goals are adequately being met by the State Forest program, and what adjustments may be needed. Analyses include an evaluation of the corresponding effects to performance measures that could be expected should adjustments be made to enhance one or more of the others.

Question/Comment(s) #2:

- Planned activities reported in the AOPs have a wide variance from the IP objectives. There should be an explanation in the AOP to explain the variance. Revise the IP if necessary. It is better to revise the IP now rather than to wait until the 10-year review to justify why the 10-year sum is far different from the IP's 10 year goal.
 - For example; the Tillamook road construction, road improvement, roads vacated and total Tillamook road miles.
 - Change IP now to reflect adaptive management strategies.

ODF Response – Management activities such as timber harvest and reforestation that are addressed in the IP's are considered to be essential. Essential or primary operations are generally considered to be “hard” targets that usually must be implemented annually within the range of the IP outputs. Certain other activities such as those related to young-stand management for example (i.e., fertilization, pre-commercial thinning, release, seedling protection, etc.) are contingent upon funding and are not necessarily essential nor considered to be “hard” targets. Road-related activities on the other hand are tied closely to timber harvest plans. Road activities were roughly estimated based upon the range of silvicultural outputs that were expected. But as the IP's describe, the range of road related activities are “potential” actions.

As operations are planned in detail, particularly “non-essential” activities, their extent may be highly variable from year-to-year. Unpredictable factors such as funding availability, fluctuating forest product markets, inflation, high labor costs, unfavorable benefit-cost ratios, forest health problems, unforeseen natural disturbances (i.e., storms, floods, etc) or material availability can affect the feasibility and practicality of achieving certain outputs.

For non-essential operations, there have been some years when planned activities were outside the range of defined outputs in the IP's. Ultimately the Districts make the final decision to approve an AOP, and have to judge when such variances are considered to be acceptable. For example, the Tillamook District's IP indicates on page 25 that achieving the desired future condition for roads is dependent upon the development of the Tillamook District Transportation Plan. This plan is expected to be completed with the next revision of the District's IP. So the District will continue to plan annual road activities consistent with the IP, but until the transportation plan is completed there may be need for flexibility and variance from the predicted extent of potential road related activities.

Agreeably, an AOP could benefit from an explanation of why certain planned activities are outside the range of an IP's particular outputs. Rationale could and are sometimes provided in the approval memo prepared and released by the District Forester.

Question/Comment(s) #3:

- What harvest level is sustainable given the current inventory information? Are the current harvest levels keeping up with the forest growth? One member thought the agency could get more volume than previously thought and another member thought the current level presents a challenge to stay within the limits.

ODF Response – Determining sustainable timber harvest is a continuous process that is dependant upon the management goals and objectives for a particular forest landowner. On State Forest lands sustainable timber harvest is considered to be a level that can be removed at a non-declining, even rate over the long-term while also achieving other multiple resource goals. Analysis is currently being conducted for the BOF to determine whether the balance between economic, environmental, and social goals mandated by the Greatest Permanent Value Rule (GPV), as represented by performance measures is being achieved on State Forest lands. Using the Harvest & Habitat (H&H) model, the analysis is re-exploring sustainable harvest levels under the FMP for the three north coast Districts.

Since the last model runs, which were conducted several years ago, there has been a considerable amount of new information that has been incorporated into the H&H model. There is more and better forest inventory data, refined growth and yield tables, better mapping of areas not suitable for commercial forest production, and other improvements.

With updated and improved data, modeling efforts can better predict whether balance is being achieved between the various goals under the FMP, or if there are adjustments or enhancements that need to be made. Analyses for these current efforts are expected to be finished late this fall, with results and potential recommendations to be presented to the BOF for their consideration.

Question/Comment(s) #4:

- One member would like clarification that the current AOP's are within the sideboards of the present FMP and IP ranges. The IP's have evolved over the years so that the levels are quite different from when the plans were adopted.

ODF Response – The timber harvest planned for the 2009 AOPs has been deemed by the District Foresters to be consistent with their respective IP's. There is however variance to note.

Adjustments resulting from adaptive management have lead to several modifications to all five of the 2003 IP's in the Northwest Oregon Area over the last four years. These adjustments are attributed to reevaluation of the balance between economic, environmental, and social goals using the H&H model. Reevaluation was conducted due to: 1) issues that have been raised by stakeholders suggesting there is an imbalance, 2) changes in the status and presence of known threatened and endangered species (T&E), 3) new and more complete forest inventory data, and 4) other updated information such as better mapping of areas not suitable for commercial forest production.

In response, the acreage range of annual timber harvest objectives that were defined originally in the IP's has been refined (within limits set by the FMP). These modifications

to the IP's were proposed at the behest of each District based upon their review of the H&H results, so that they could more effectively and efficiently achieve FMP goals and objectives.

Table 1 in a Districts individual AOP Summary document compares the 09 objectives with the range of IP outputs (as modified). Modifications that have been made to the IP's can be viewed at the following website:

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

Another factor to consider is the December 2007 windstorm, which resulted in further revision to the 2009 AOP itself, altering its originally planned sale configuration (for Astoria District only). Specifically, stands of wind damaged timber were substituted for acres originally planned for regeneration harvest. But they are not equal; there are more wind damaged acres than the originally planned regeneration harvest.

It was decided by the District forester, agency leaders, and program staff that immediately salvaging wind damaged timber made sense and provided multiple benefits. In part these include: 1) capture volume that was part of the standing crop prior to wind damage, 2) capture volume before natural decomposition diminishes log value, 3) provide an immediate influx of revenue to local mills, workers, and economies that suffered from the storm, 4) deferring originally planned regeneration harvest would contribute to opportunities in future AOPs.

These factors make it somewhat unclear whether or not the AOP is consistent with the IP. In the approval memo from the Astoria District Forester it is concluded that, although there are differences between the modified IP outputs and the FY09 AOP, the unforeseen catastrophic storm make them acceptable.

Question/Comment(s) #5:

- Concern was expressed that the landscape design in the 2003 IP's, which are used to determine stand prescriptions that will promote the development of complex forest structure to provide future habitat are out-of-date. Updating and revising the landscape designs using the experienced gained over the past several years, and given all of the new inventory information, would be in the interest of adaptive management and lend more acceptance and credibility to the planning processes.

ODF Response – All five Districts in the Northwest Area have expressed an inclination to refine their landscape designs. To revise a District's entire landscape design would by FMP definition require a major modification to their IP, which necessitates a public involvement process.

Lessons learned, hindsight, and new information has provided the Districts with a vision of how to make it better for achieving FMP goals and IP objectives. Several have informally drafted prospective variations.

Additionally, the BOF is currently analyzing the balance of goals on State Forest lands. Conclusions resulting from that analysis could lead to the need for revising landscape designs. It is highly probable that revision efforts will be conducted in the near future.

Question/Comment(s) #6:

- Does fertilization contribute to desired future condition (DFC)? Has an economic cost/benefit analysis been done?

ODF Response – Since the landscape designs were adopted with the 2003 approval of the District IPs, fertilization has not been pursued in stands designated as DFC complex. Fertilization has mostly been conducted on State Forest land by the Forest Grove and North Cascade Districts in areas designated as “GENERAL” by the Land Management Classification System (LMCS). Under the “GENERAL” classification integrated management strategies are to be practiced in concert with timber production. Young stands are the primary focus of fertilization opportunities, where enhanced growth is planned to be captured and the investment realized via future timber harvest(s).

Field foresters determine the suitability of stands for fertilization using established methods which have recently been included into the newly adopted Young-Stand Management Handbook. Methods include a basic screening process to determine candidate stands with the greatest potential, and conventional benefit/cost analysis. Most fertilized stands have been plantations, though there have been a few heavily thinned merchantable stands that have also been treated.

Question/Comment(s) #7:

- Is landscape design, namely the arrangement of future complex forest structure going to be revised due to storm damage?

ODF Response – Wind damaged stands currently designated by landscape design to become future complex forest structure are not being considered for re-designation at this time. It is possible however, that they could be designated differently if the landscape designs are revised in the future.

Question/Comment(s) #8:

- How do Districts deal with catastrophic events that might cause them to plan timber harvest or road construction that is outside the range of their IP defined ranges?

ODF Response – Since the adoption of the IP’s in 2003 there have been few storm events considered “catastrophic” that have greatly affected timber harvest operations on State Forest lands; with the exception of the winters of 2006 and 2007. In response to the wind damage from those storms several procedural changes to guidance and policy resulted.

The first was an internal decision that altered the Annual Harvest Objective guidance to address salvage. It directed that volume in primary sales in the AOP be substituted with like-kind salvage volume. The volume to be recovered from wind damaged timber was not intended to be in-addition-to the volume that was originally defined by the annual harvest guidance for the AOP’s. Thus, select timber sales that had been originally planned as primary operations were deferred on several Districts to accommodate the influx of salvage volume. The sales that are dropped, or deferred will be re-incorporated into another AOP in the near future.

The second change entailed minor modifications to both the Astoria and Tillamook Districts IP’s. They adopted language into their 2003 IP’s that addressed the need for flexibility in the event of unforeseen catastrophic circumstances such as extreme weather

and storms. If due to such an event salvage of damaged timber is deemed a necessity, then the Districts recognize that there could be instances when it is acceptable for the extent of harvest, as affected by salvage, to be outside the ranges defined by the IP's. The limit of what is considered acceptable, or minor variation outside of the IP ranges is principally the District's prerogative to recommend.

Resource-Specific Comments

Question/Comment(s) #1:

- A suggestion was made to increase the amount of Forest Inmate Crew Coordinators and South Fork inmate crews that are dedicated to trail work.
- Recreation is an increasing part of Oregon's economy and State Forest recreation management should also be increasing.
- The recreation program needs additional standards that are both measurable and quantifiable.
- There may not be an equitable balance on the social emphasis of GPV (recreation) due to the increasing emphasis on the environmental and economic benefits generated through timber harvest and the resulting revenues to the counties.
- The agency has overachieved timber volume while under-achieving recreational objectives.
- ODF often meets harvest goals but often does not achieve recreational goals.

ODF Response – Growing recreational use on State Forests has long been recognized. Yet the funding, staff, and recreation organization within the State Forest program has been unable to increase its capacity at the same rate as the exponentially increasing demand. Generally, recreation projects in the AOP's reflect expected available funding.

Recreation outputs defined in the IP's are not broken down into annual targets as is timber harvest and other related activities, due in-part because timber harvest pays for itself while recreation typically does not. Essentially, recreation goals are not managed as hard targets due to uncertain funding, so they were not defined in detail in the IP's.

The funding structure for recreation is much different. Projects are only partially funded by dollars originated by timber harvest; they are dependant more upon supplemental capricious sources such as grants. Usually maintenance of existing programs and facilities can be reasonably assured funding for inclusion into an AOP.

Efforts are underway, as has been presented to SFAC, to develop more fully a strategic approach to recreation management on state Forest lands. The 2nd-Party Recreation Assessment Report identified the need for more comprehensive strategic-level planning and recommended certain actions to help address the rising demand. But without steady and assured funding the recreation program on State Forest lands is in a holding pattern. New expansion and development has been deferred for now.

Nonetheless, the recreation program will continue to include funded projects into the AOP's to meet relevant goals and needs as best it can. Annual recreation targets will continue to be somewhat indefinable, contingent on funding availability, and not readily comparable to those of other resource goals such as timber harvest.

Inmate crews will continue to serve as an important source of affordable labor necessary for getting work completed. The number of their crews however are finite, and they are in high demand to complete work that is often considered to be equally or more important, such as reforestation and firefighting. Their availability has to be prioritized accordingly.

Question/Comment(s) #2:

- **There was a concern that the invasive species control and noxious weed treatment is not sufficient.**

ODF Response – Noxious weed control on State Forests has been a part of annual operations for years. Early efforts were limited, but their degree of importance has been gaining, and projects have become more integrated into annual planning. The FMP identifies the need for contributing to statewide efforts to reduce the quantity and range of invasive non-native plants. This goal is reiterated in each District's IP, but there is no annual target specified. Projects are contingent upon funding availability and prioritization.

Projects or treatments are usually identified in the summary document of an individual District's AOP. Typically, they are planned by the reforestation and engineering units, and are implemented using contract labor (in conjunction with release and brush control projects or road related contracts), inmate crews, volunteers, and partnerships. Treatments are also conducted by District road maintenance and repair crews as a part of their annual activities. Larger eradication projects are usually planned in cooperation with individual user groups who sometimes secure matching grant funding or provide volunteer assistance.

The Oregon Dept. of Agriculture has been leading cooperative efforts to promote incorporation of strategies into agency programs. In response, the ODF has been formulating strategies and methods for incorporation into State and Private Forest programming. Staff work groups have been working on direction and guidance for developing District- specific plans to prevent, control, and eradicate the spread of invasive plants. Funding constraints and budgetary limitations ultimately affect the sufficiency of the program's intentions to achieve all of those goals. But some tactics, such as Best Management Practices, education, and public outreach can be incorporated into annual programming to minimize spread across State Forests without direct cost.

District-Specific Comments

Question/Comment(s) #1:

- **Concern was expressed about overstocked stands in the Jewell area and the fire hazards these closed single canopy stands with smaller diameter trees present.**

ODF Response – Foresters are typically inclined to treat all young over-stocked stands. There are a variety of factors that weigh-in on decisions regarding the selection of stands to treat on State Forest lands. In general, the risk of wildfire in the northern Coast Range is by comparison substantially lower than other more fire-prone areas such as southern and eastern Oregon.

For the Jewell area, other factors tend to be more influential in driving the decision for which stands to select for thinning on an annual basis. One of the most important factors for example includes agreements with the U.S. Fish and Wildlife Service to limit harvest within a designated area and certain aged-stands that occur in it to conserve and protect northern spotted owl habitat. A number of other factors also play into prioritization of potential thinning opportunities from year to year. In the 2009 and 2010 AOPs there are 4 sales that propose to thin an estimated 280 acres of State Forest lands in the vicinity of Jewell.

Thinning will continue to be a priority investment, particularly in young-dense stands. Scheduling thinning opportunities will be based upon both local- and landscape-scale considerations, including goals and objectives defined in the FMP and the District's IP. For example the desired future condition of the extent and distribution of stand structure types by management basin, or as defined by landscape design will, in concert with current stand conditions, contribute to decisions of when and where to pursue thinning opportunities across the Astoria District.

Question/Comment(s) #2:

- A question was raised about the “Headwater Amphibian Research” being conducted on the Forest Grove District with OSU.

ODF Response – There was a project completed in 2004 to evaluate monitoring methodologies. Results were intended to aid in the development of a methodology for monitoring the effectiveness of aquatic and riparian strategies at conserving and protecting amphibians and their habitat on State Forest lands. The study occurred on Buster Creek and Rock Creek on the Clatsop and Santiam State Forests respectively. Follow-up and future additional sampling was expected to occur on new sites including some on the Forest Grove District. Efforts however did not resume due to other research and funding priorities.

One of those priorities includes the initiation of the Trask River Paired Watershed Study. Sponsored by the Watersheds Research Cooperative, a collaboration of individuals, private companies, organizations, and agencies lead by OSU's College of Forestry, the study will look at potential effects to a variety of resources (including amphibians) from forest management practices on private, state, and federal lands.

Question/Comment(s) #3:

- AOP for Tillamook district does not sufficiently address the transportation planning challenges for that district nor does it address how the projects are progressing toward the goals of the FMP.

ODF Response – Transportation planning continues to be a challenge on the Tillamook District. Long range planning of transportation system development is not fully

integrated with timber harvest planning. A principle obstacle continues to be the cost ratio of road construction to timber value. As is well known, the severity and extent of rugged terrain on the Tillamook District is greater than on any other. Coupled with an overabundance of low value timber, circumstances on the Tillamook are far less than ideal to pay for the development of an extensive road system. A minor modification to the IP could be prepared to explain these difficulties and the need for flexibility.

On page 25 of the District IP the desired future road system is supposed to be defined by a Transportation Plan that is under development. It's expected that the plan will be ready for incorporation into the next revision of the IP. While a committee of agency staff and stakeholders to address the issue has been assembled, and some analysis has been done, progress has stalled. It is acknowledged that the Tillamook District Transportation Plan needs to remain a high priority, and become reinvigorated as a necessity for long-range planning and forest management.

Question/Comment(s) #4:

- Will the final version of the AOP's be within the IP range for the Astoria District once they replace planned sales with salvage sales?

ODF Response – The acreage and mix of harvest types for Astoria's 2009 AOP is outside of the ranges defined by their IP (see also General Comment No's #4 & #8 above). In his approval memo, the District Forester decided this was acceptable due to the unforeseen circumstance of the catastrophic storm in December 2007, which resulted in a need to conduct extensive salvage operations.

Typically, the extent of harvest proposed in an AOP will be within the IP defined ranges. But in this case the decision-maker, within their authority, granted a one-time exception. The District Forester also directed that verbiage be inserted into their IP indicating that when unforeseen catastrophic events occur, it may be a necessity to grant exceptions to being consistent with the annual objectives defined in the IP.

Question/Comment(s) #5:

- Will the timber value be the same in the Astoria District due to incorporation of salvage sales?

ODF Response – Typically the per-unit price for wind damaged timber is less than non-damaged timber due to greater breakage defect, higher logging costs, and other operational- and market-related considerations. In this case however the volume that was originally planned for the 2009 AOP was increased by about 8.7% due to the proposed salvage operations. Thus, although the per-unit value of the AOP is somewhat less due to salvage, the overall value has increased because there is a greater amount of volume being offered than what was originally planned.

Question/Comment(s) #6:

- Tillamook District AOP (and possibly the Astoria District AOP) does not address the impacts of the 2006 and 2007 storms and how they affect the IP and AOP.

ODF Response – The Tillamook District opted to replace primary sales that were proposed in their approved 2008 AOP with salvage operations. This was done because of the downturn in the market, which caused project and reforestation costs in several of the originally planned sales to become greater than the value of the timber to be sold. Therefore, the District Forester proposed a modification to the 2008 AOP to replace certain primary sales with salvage operations, which was subsequently approved.

In contrast, the Astoria District decided to include salvage operations as an integral part of their 2009 AOP. Because they had so much wind damage, the District Forester addressed his decisions for incorporating salvage operations into the 2009 AOP in his approval memo to the Area Director.

Question/Comment(s) #7:

- A question was asked why the higher net present value for the Forest Grove District is greater than for the Astoria District.

ODF Response – The Forest Grove District offered less hemlock volume in their AOP compared to Astoria. The value of hemlock has a lower per-unit value. Additionally, Forest Grove offered more pole material in their 2009 AOP. Poles fetch a high per-unit price and are highly sought after in the current market because they are not so readily abundant and available. There are also some minor variations in haul costs between the districts due to the proximity of mills purchasing the logs.

Question/Comment(s) #8:

- A question was asked about the hardwood mix and its percentage of the forest.

ODF Response – Estimates in the Astoria AOP are from the 2003 IP. The District has conducted a substantial amount of inventory since, and has been updating those estimates. These refinements have been incorporated into the H&H model, but not necessarily reflected in their AOP.

The Tillamook District recently completed a major improvement to their timber typing. New polygon/stand delineations have provided them with a vastly improved estimate of the extent and location of their hardwood stands. These new stands however, have yet to be inventoried (i.e. measured). So their estimates are primarily based on acres and a few representative hardwood stands that have been measured. The District is in the process of updating its hardwood estimates for the H&H modeling.

The Forest Grove District is in a situation similar to Astoria. Also, they plant hardwood (red alder) to combat several species of root rot that attack conifers, and is prevalent on their ground. They also have several hundred acres of plantation on their District that is either completely or partly comprised of hardwoods. These were planted to hardwood in areas where there was extensive root rot in an effort to contain its spread.

Question/Comment(s) #9:

- There are relatively fewer acres of vegetation management activities planned in Tillamook (50 acres versus Forest Grove's 350 acres). Is Tillamook conducting enough release?

ODF Response – Some Districts count release projects as site preparation in their AOP. There needs to be more consistency between the districts differentiating what is considered site preparation and what is considered release. Variations in whether a district considers an activity as site preparation or a release treatment are often merely personal differences. This is a consistency issue that is being pursued.

Question/Comment(s) #10:

- FEMA projects at times conflict with plan objectives. An example is the plan to recover a storm damaged OHV trail on the Tillamook District. Money will not be there due to FEMA projects. ODF needs to assess the costs to recover this trail and include it in the AOP despite FEMA's unwillingness to cover this cost.

ODF Response – The Tillamook District included four projects in their 2009 AOP that entailed upgrades and repair to storm damaged segments of OHV trails that would be partially funded by FEMA (Federal Emergency Management Agency) dollars. District road crews, inmate labor, and volunteers will also contribute to the work. Funding availability for storm-damaged segments of one trail however, identify FEMA as the sole source. FEMA has not yet approved the funding for this work; and it was questionable as to whether or not it would be included in the AOP.

The trail repair project will be included in the final AOP, whether or not FEMA funds are secured. If they are unavailable, then the District will look for other means to complete the work. By including the project in the AOP despite uncertain funding, the District has conducted due diligence for public review, listed it for potential scheduling, and identified a need for conducting the work using alternative funding.