FY 2025 ANNUAL OPERATIONS PLAN

Public Comment Summary

Public Involvement and Summary of Changes:

FY 2025 Annual Operations Plans for Astoria, Forest Grove, Klamath-Lake, North Cascade, Tillamook, West Oregon and Western Lane Districts

In order to engage with Oregonians, the Oregon Department of Forestry (ODF) held a 45-day public comment period, which began April 03, 2024, for the upcoming fiscal year's Annual Operations Plans (AOP). 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, notification on the ODF website, and posts on ODF's Facebook, Instagram & Twitter platforms. Public comment was accepted through the ODF website, email, or letter, as well as a survey that will help the department gather some aggregate data on public opinion regarding state forest matters and forestry generally, as well as ways to improve our public outreach strategies.

In all, ODF receive 1,061 written comments related to the fiscal year 2025 (FY25) Annual Operations Plans for the Astoria, Forest Grove, Klamath-Lake, North Cascade, Tillamook, West Oregon and Western Lane districts. Each comment received was reviewed and the feedback considered through the lens of aligning with State Forests current plans and policies. Comments received that resulted in edits to specific timber sales are detailed in Appendix D of the district Summary Documents and detailed at the end of this document.

In addition to the sale specific updates, the following is a high-level summary of the comments received highlighting the major themes, topics, and the agency responses.

RECREATION COMMENTS

The agency received comments and recommendations regarding recreation. These included:

- Support of the Larch Mountain Trail project. Permanent bathrooms should be added to the project.
- Restrooms and garbage cans at trailheads are essential towards maintaining the health and beauty of the forest. Add permanent bathrooms to the Drift Creek and Fear and Loathing trailheads.
- Add accessible blue looped trails, adaptive mountain bike trails, climbing trails, trails with less degree of exposure with fall hazards and trails of different riding levels.
- Build more mountain biking trails especially in the Drift Creek Wilson River, Gales Creek, Reehers Camp areas.
- Reevaluate mountain bike trail ratings as the training, techniques, and equipment have evolved, so have the abilities and safety of the mountain bike community.

- Use volunteers to build a gazebo/covered structure with benches near the mountain biking trails to provide protection from the elements.
- Implement no harvest, selective harvests or protection measures such as buffers around trails to lessen the impact of harvest operations to the trail user's experience.
- Commenters provided several recommendations for improvements for specific trails that ranged from trail redesign, improvements and maintenance.

RECREATION COMMENT RESPONSE:

Infrastructure Development: Infrastructure needs for recreation facilities vary from site-to-site. Volume of use, type of use, seasonality of use, infrastructure cost and maintenance, and location are carefully considered when selecting the type of infrastructure to be installed. Restroom facilities will be installed where there is an identified need and may include installation of a permanent structure or installation of seasonal portable toilets. For example, due to the increased use on the Larch Mountain Trail System and specifically at the Drift Creek Trailhead, ODF has installed a portable toilet and will continue to monitor usage. Additionally, ODF promotes the pack it in-pack it out message as much as possible to minimize infrastructure and maintenance need while encouraging recreationists to take ownership and responsibility of managing trash on state forest land. Trash and garbage receptacles are installed at campground and day-use facilities. Generally, trailheads do not have trash cans installed. However, similarly to the restroom use at Drift Creek Trailhead ODF will continue to monitor for the need of trash receptacles on site.

Trail Planning and Maintenance: ODF strives to provide high quality and diverse recreation opportunities for the public on state forest land as much as possible. Recreation Staff will consider the feedback received during this public comment and will continue to work with individuals, local clubs, and organizations to address maintenance concerns, trail planning needs, and ensure the Recreation Program evolves with the progression of use across state forest land. When improvement or upgrade needs are identified, project work is addressed through maintenance activities conducted by Recreation Staff or forwarded as an improvement project identified in the Annual Operation Plan for implementation. Project implementation and completion is based on funding and labor resource availability.

Trail condition assessments on all trail miles are completed by Recreation Staff annually to identify maintenance and upgrade needs. Specific maintenance plans are developed within the fiscal year based on yearly trail condition assessments. FY25 Annual Operations Plan publication occurs prior to completion of FY25 trail condition assessments. The goal is to maintain all trail miles to operational standards based on use type and difficulty level while still maintaining the appropriate resource protections.

Trail/Harvest Buffers: State forests are working forests, and it is inevitable there will be interactions with the growing recreation infrastructure and forest management activities. The Department of Forestry recognizes that timber harvests can and often do change the trail setting on the landscape and the use experience for trail enthusiasts. The agency works in an integrated manner across the Recreation, Education and Interpretation, young stand management, roads and forest management teams to address these situations. For trail mitigation measures, Foresters work in conjunction with Recreation Program Staff as well as other team specialists to achieve a mix of social, economic, and environmental benefits during sale layout consistently across the division.

Trail buffers are implemented where economically feasible and compatible with other management objectives. Generally, it is common practice to extend no-harvest buffers around recreation trails that are near riparian conservation areas, green tree retention areas, and other environmentally sensitive areas.

CLIMATE CHANGE AND CARBON COMMENTS

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

- Preserve old growth and mature trees for climate change mitigation, carbon sequestration, sinks and storage.
- Old growth sequesters more carbon than plantations of similar trees.
- Reserve all trees over 21 inches to store and sequester carbon. Large trees store and sequester carbon and thus mitigate climate change.
- Preserve all forests for habitat, clean water, and carbon sinks.
- Recommend cancelling proposed harvests in currently complex forests as large trees store carbon, mitigating climate change and meeting Climate Change and Carbon Plan goals.
- Commentors note that the AOP are inconsistent with ODF's draft FMP goals and the stated goals and strategies in the ODF Carbon and Climate Change Plan.
- Recommendation to apply climate smart forestry practices such as variable density thinning, afforestation, longer timber harvest rotations, and limiting the diameter of harvested trees, all of which allow timber harvesting with minimal impacts on climate change.
- ODF should evaluate the climate impacts of proposed logging and road construction.
- Several commenters were concerned about the effects from climate change and called for greater forest diversity and stable slopes and stream systems.

CLIMATE CHANGE/CARBON STORAGE RESPONSE:

State Forests are currently managed to provide for a diverse, healthy, productive, and sustainable forest ecosystem over time that will be more resilient to climate change.

The Climate Change and Carbon Plan outlines the goals and practices that will be incorporated into the draft Western Oregon FMP and associated Implementation plans. This process is currently underway but in the short-term has left a transition period until those plans are finalized and adopted. During this transition period the goals and practices identified for State Forests in the ODF Climate Change and Carbon Plan are met in a multitude of ways.

Currently large portions of the State Forests are managed under our current plans including draft Habitat Conservation Areas, Riparian Conservation Areas, areas with a desired future condition of Layered or Older Forest Structure, forested areas that are inoperable, and no-harvest wildlife areas. These areas are mostly comprised of mature stands and act as long-term storage areas for carbon that also actively sequester carbon throughout large portions of the landscape.

Land outside of these areas that are managed primarily for timber harvest also have trees that actively sequester carbon while they grow and shift to static carbon storage as trees are harvested and

transformed into wood products. Within harvested areas, legacy structures retained such as green trees, snags, and down wood will continue to store carbon as the seedlings around these structures grow. Existing old growth trees (defined in the FMP as 175 years or older) which are generally scattered individual trees or occasional small, isolated patches are protected from harvest under the Northwest and Southwest State Forest Management Plans and contribute to carbon sequestration and storage.

Forest health strategies are addressed on a site-specific basis for areas impacted by insects and diseases such as Swiss needle cast and when reforestation plans are developed for planting and other young stand management treatments. Site specific prescriptions consider target species mix, aspect, elevation, soil types, Swiss needle cast risk where applicable, Phellinus weirii (laminated root rot) presence, required stocking guidelines, natural advanced regeneration, and the desired future condition of the stand.

State Forests is partnering on several projects that study the effects of climate change. One of these projects is with the Northwest Tree Improvement Cooperative and USFS Pacific Northwest Research Station in two assisted migration studies on the North Cascade District that could inform reforestation and young stand management practices for climate change mitigation. The first study is testing for genetic factors that may make seed sources more climate resilient. Another study is planting seedlings from different climate regions at different densities to test for climate adaptations. Studies like these will help to inform and improve strategies used on State Forests for climate change mitigation.

Work on State Forest goals in the Climate Change and Carbon Plan will continue as the BOF works on the performance measures for the draft Western Oregon State Forests Management plan and will be incorporated into an upcoming Implementation Plan process once the draft Western Oregon State Forest Management Plan has been approved.

TIMBER HARVEST COMMENTS

ODF received a number of comments regarding the state forest timber harvest program and impacts to varied resources as well as support for forest management. Comments included:

- Numerous comments opposing clearcuts. Some commenters wanted clearcuts stopped altogether or replaced with thinning, while others suggested that clearcuts should be focused in plantations only and not in natural stands.
- Consider alternative methods of timber harvesting such as selective logging or sustainable forestry practices.
- State forests should be managed for multi-use and shouldn't be clearcut or sprayed for profit.
- State forests management should be focused on conservation and stewardship instead of jobs.
- Specific recommendations to stop timber harvesting and spraying in the Astoria District and Southern Oregon.
- Focus clearcut harvest activities in stands that have already been managed, leaving naturally regenerating legacy stands to preserve older stands, protect watersheds, biodiversity, seed sources, and serve as habitat reserves. Don't harvest unmanaged stands.
- Commenters indicated that shifting away from timber harvesting to ecosystem, habitat and watershed restoration and protection and ecosystem conservation would increase jobs, increase incomes and provide a more robust tax base to support schools and services.

- Wildlife habitat, water quality, and water quantity should be considered before implementing any management actions in State Forests. Operations should only be allowed if they do not diminish the quality or extent of wildlife habitat and water resources.
- Concern that clearcutting is the reason there are more cougar sightings near homes.
- Commenters noted that impacts to local communities, tourism, the environment, and logging related climate pollution were greater than the short-term financial gain from clearcutting.
- Oregonians don't get a fair amount of revenue from timber harvests.
- Increase the harvest rotation age to increase timber production, ecosystem services, funding of county services and to be consistent with the greatest permanent value of the forest.
- ODF should discard this plan and start over, using best available science.
- Increase retention to provide continuity between forest generations in biological richness, functional capabilities, and structure in order to harvest sustainably.
- Support for timber harvest within State Forests.
- Increase thinning and clearcuts to decrease fire hazards because current logging practices provide clean water, renewable resources, world class recreation and funding for counties.
- There should be more forest management focusing on thinning.
- State Forests should be managed for all Oregonians, not just certain people that have this idea that it needs to be saved at any cost. Locking and keeping the industries from harvesting the timber that pays back into the communities of this state will be a failed process.
- Support for logging and support natural resources industries but should avoid harvesting old forest in certain sales.
- Increase harvest and revenue as the harvest volume is down compared to recent and projected levels and is below the upper limit of the Implementation Plan range. This affects ODF's budget as well as the counties and local taxing districts that receive revenue from ODF timber sales.
- ODF should be maximizing harvest volume at every opportunity.
- Follow State Foresters Mukumoto's letter to BOF to look for opportunities to increase harvest levels.
- ODF should be doing everything possible to increase harvest and revenue to put everyone who relies on state timber sales on a glide path, rather than a cliff.
- ODF could make sales more attractive by including ground-based units, modified clearcut units with partial-cut sales, or offering more work order contracts outside of timber sales.
- Sales adjacent to adjacent landowners could result in impacts to property values and investments, property damage, and potential litigation.
- Buffer adjacent properties with a greenbelt to ensure that blow down doesn't occur.
- Annual Operations Plan does not use the best available science for this AOP, ignores economic data and research findings, and doesn't identify inequalities or the economic impacts to all Oregonians.
- The cost of doing certain sales is greater than the profits that will be received and will impact ecosystems, aesthetics, property values, tourism, and recreational and commercial fishing.

<u>Complex/Mature Forest Management</u>: ODF received comments concerning legislative Key Performance Measures and harvesting in complex/mature forests were received. Concerns and recommendations included:

- Prioritize the retention of mature, older stands, legacy forests, second growth, complex layered forest structure, and old growth.
- Don't harvest trees ranging from greater than 60 years old to 100 years or older because they are mature ecosystems that contribute to the environment and provide climate benefits.
- ODF and this AOP are failing to meet Key Performance Measures for complex stands. Harvests of complex stands should be changed to partial cuts or halted until Key Performance Measure #10 is met.
- Retain all complex layered forest structure consistent with key performance measure threshold of 30%.
- Increase the number of stands with complex desired future conditions to meet the key performance measure #10 of at least 30% of each landscape being complex layered condition.
- Concern about conversion of stands with existing layered complex forest structure and converting the Desired Future Condition (DFC) to non-complex.
- ODF continues to clearcut layered and older stands despite being far below the complex/old forest performance measures approved by the Board of Forestry and the legislature.

HCA management: Implementation of the draft Habitat Conservation Plan is a topic of concern for many. Comments received include:

- Proposed clearcuts do not align with the Habitat Conservation Plan or are an opportunistic move to harvest an area soon to be protected by the Plan.
- Inappropriate to proceed with logging and road building inside Habitat Conservation Areas, Riparian Conservation Areas and Aquatic Anchors prior to a final decision while the HCP is under federal review.
- The AOPs don't maximize the forest restoration opportunities within the proposed Habitat Conservation Areas.
- FY25 AOP management within healthy conifer, Swiss needle cast or hardwood-dominated stands is much less than the annual maximum of 2,500 acres of HCA treatments allowed under the draft HCP.
- ODF should consider alternative actions to clearcutting or avoid timber harvest within Habitat Conservation Areas.
- Removal of trees within Habitat Conservation Areas disrupts critical habitats for numerous plant and animal species, leading to loss of biodiversity and fragmentation of ecosystems.
- Oregon Department of Forestry should reevaluate its clearcutting policies and implement measures to protect and preserve Habitat Conservation Areas, Riparian Conservation Areas, and Aquatic Anchors.
- There is potential loss of a covered species habitat by thinning layered stands within HCAs and NSO circles.

Scenic Resources: Specific concerns and recommendations around harvest impacts to visual resources were received:

- Visual impacts from clearcutting will be seen from the Columbia River, Hwy 30 and will impact boaters, property values, and tourism.

- Forest Practice Act rules for harvesting adjacent to scenic highways are not being followed and are being circumvented due to safety reasons.
- Opposed to clearcut within a designated scenic area.
- Dislike seeing clearcuts and monocrops of trees.
- Establish scenic and protective buffers between a harvest and adjacent private landowners to mitigate visual and environmental impacts.

TIMBER HARVEST RESPONSE:

Greatest Permanent Value/Policy Framework: The operations and projects planned for this Annual Operations Plan seek to balance the agency's legal obligation to manage state forests for social, economic and environmental outcomes, a concept commonly referred to as Greatest Permanent Value. State forests provide outdoor recreation, education and interpretation opportunities, essential fish and wildlife habitats, clean water, and sustainable harvest volume that produces jobs and revenue that funds vital services in rural counties, local districts, and schools throughout the state.

Greatest Permanent Value provides the foundation on which forest management plans are developed and provide the framework for how State Forests are managed. Forest management plans identify the resource goals and strategies intended to achieve an appropriate blend of resources using the best available science. The Board of Forestry is responsible for reviewing and approving forest management plans to ensure the plan will secure the Greatest Permanent Value for Oregonians. The Northwest and Southwest State Forests Management Plans and the Eastern Oregon Region Long-Range Forest Management Plan provide direction for the Fiscal Year 2025 AOPs. While the Forest Management Plans set certain management standards, primarily associated with resource protection, there are many instances where different management options may achieve Forest Management Plan goals and Implementation Plan objectives.

Operational policies guide decisions within this range of options by defining specific procedures and best management practices that allow for management flexibility, while ensuring sound management, resource protection and compliance with required laws.

Implementation Plans describe the management approaches and activities designed to achieve the Forest Management Plan goals and the draft Habitat Conservation Plan goals and objectives. Implementation Plans provide linkages among the Forest Management Plan, draft Habitat Conservation Plan, operational policies, and on-the-ground activities that are described in these Annual Operations Plans. Trade-offs for many of the topics for which public comments have been received are assessed and considered at the landscape level and are then incorporated into the Implementation Plans. Implementation of these plans and policies will result in a variety of forest stand conditions across the landscape that maintain healthy, multi-species, vigorously growing forests, which will contribute to resilient healthy forests into the future. This will be achieved by both active and passive management of the forests. The sales in the FY25 AOP have been developed to meet all requirements in the plans and policies above and are required to meet the balance of Greatest Permanent Value.

Harvest Levels: Harvest levels were determined when the district Implementation Plans were revised in 2023 by modeling the requirements in the FMPs, draft Habitat Conservation Plan, operational policies, and current conditions. This modeling estimated both harvest depletions and stand growth for multiple

decades beyond the Implementation Plan term and was based on an even-flow goal, meaning harvest levels had to remain constant period-to-period. These harvest levels were reviewed for implementation by the districts before approval.

The majority of the harvested volume will come from lands outside of designated draft Habitat Conservation Areas, designated Desired Future Condition complex areas, Riparian Conservation Areas, no harvest wildlife areas, forested areas that are inoperable, scattered remnant old growth trees, recreation and scenic areas, etc. These lands are primarily managed for economic benefits but will contribute to other resource values. Some volume will result from habitat restoration or improvement projects within draft Habitat Conservation Areas. Rotation ages of harvests are not set at a specific age, but rather are a product of stand condition, stand health, and annual harvest objectives.

Volume targets are discussed in each districts' summary document. However, some events may result in an Annual Operations Plan volume that is outside the planned Annual Harvest Objective range. These events may consist of, but are not limited to, storm damage, insect and/or disease outbreaks, prepared timber cruise results versus Annual Operations Plan volume estimates, timber market conditions or other significant events. Additional timber sales or timber sales included in the Annual Operations Plan may be sold as primary operations in response to any of these circumstances. Additionally, the State Forester has directed State Forests staff to look for opportunities to add additional volume to try to offset any immediate economic impacts from the reduction in volume of the current Implementation Plans as compared to the previous Implementation Plans.

Complex/Mature Forest Management: As described in the Implementation Plans, ODF does harvest layered stands outside of the mapped landscape design for the Desired Future Condition and the draft Habitat Conservation Areas. While putting together the FY25 Annual Operations Plans from the surveyed candidate pool, agency staff looked for stands that were both outside of the mapped Desired Future Condition and outside draft Habitat Conservation Areas for harvest. Some of these stands are currently complex stand structure or older stands. The harvesting of these types of stands is a tradeoff decision that was made in order to implement the current Forest Management Plans and honor the process of developing and implementing the draft Habitat Conservation Plan, while still meeting the harvest objectives within the Implementations Plans. Areas designated as desired future condition complex and areas that have been designated as draft Habitat Conservation Areas have been identified as the highest priority for wildlife habitat across the landscape and are the location where older trees and complex stands will be grown over time. Focusing harvest in mature stands outside of these constrained areas ensures that other aspects of GPV and Implementation Plan objectives are being met while allowing younger stands to grow older and more complex in a sustainable matter.

In Oregon, one way agency performance is measured is through legislative key performance measures. Key Performance Measure #10 has a target to reach 30% complex structure over time on the Astoria, Forest Grove and Tillamook districts. This key performance measure is utilized to show the trends of ODF's policy implementation over time to help inform decision making. The timeline to meet this target is outlined in each District's Implementation Plans and reflects the areas that are designated through the current plans and policies where these stand structures will be achieved over time. The 2023 Annual Performance Progress Report Key Performance Measure #10 shows that implementing current policies, levels of complex stands have an upward trend and are increasing across the landscape with a net gain

of approximately 6,350 acres over the last four years (increasing complex structure from 10.17% to 11.44%, using Stand Level Inventory for the combined Astoria, Tillamook, and Forest Grove Districts).

Harvesting within Habitat Conservation Areas: The draft Habitat Conservation Plan designates Habitat Conservation Areas, designed to provide habitat for covered terrestrial species. Harvest is allowed inside Habitat Conservation Areas solely to develop or improve habitat. Riparian Conservation Areas are designated for aquatic species, where harvest is not allowed. Covered amphibian species will benefit from the combination of these conservation areas. Under the draft Habitat Conservation Plan the areas outside of the Habitat Conservation Areas and Riparian Conservation Areas will primarily be managed for revenue and volume in order to meet other aspects of Greatest Permanent Value. Conservation Actions required under the Habitat Conservation Plan for areas outside of Habitat and Riparian Conservation Areas are intended to minimize impacts to covered species from timber harvest and other covered forest management activities. Habitat values provided for covered species outside the conservation areas will oscillate over time and space, supporting landscape level changes during implementation of the Habitat Conservation Plan. The overarching management objective for draft Habitat Conservation Areas is to increase the quality and quantity of habitat for terrestrial covered species through both passive and active management. Therefore, the only management actions that will occur in draft Habitat Conservation Areas are those that will contribute toward achieving that objective, or at least will not preclude that the objective will be achieved. There are many pathways for achieving habitat conditions over the long-term. Stand management activities in portions of the draft Habitat Conservation Areas will be implemented in order to improve habitat over the long term for covered species. Typically, this will include a variety of density management prescriptions in healthy conifer forests to ensure that late-seral structure develops more quickly. In some cases, such as stands that are dominated by hardwoods or infected with Swiss needle cast, it will be more efficient to conduct regeneration harvests and replant a species mix that will develop into covered species habitat in a shorter time frame, however, many hardwood-dominated stands (70%) and Swiss needle cast stands (67%) within the draft Habitat Conservation Areas will remain unmanaged at least for the first 30 years.

The draft Habitat Conservation Plan allows for an average of 1,500 acres of partial harvest and 1,000 acres of habitat restoration regeneration harvests within draft Habitat Conservation Areas per year. As the intention for management activities in these areas is to improve covered species habitat, stands that are already high-quality habitat will require little to no management. Stands that provide lower quality habitat or no habitat will be managed in order to increase the quality and quantity of habitat over time. Working with agency biologists, these areas will be field evaluated for suitability to develop potential candidates and generate appropriate prescriptions to ensure compliance with the commitments set forth in the plan. In the Fiscal Year 2025 AOP, 586 acres of partial harvest and 224 acres of habitat restoration through regeneration harvest are planned. The Biologists will work with field staff during sale layout to further refine harvest prescriptions to meet habitat objectives. The Division's intent at the beginning of implementing these strategies is to ensure that the proper types of stands are being chosen to work in and appropriate prescriptions are applied for each stand. As more of this work is done, the pace and scale of the activities within the Habitat Conservation Areas will increase.

Scenic Resources: State forest lands provide a unique experience as these lands are actively managed and provide for a wide range of forested settings. Visitors can expect to see thinned stands, regeneration harvests with leave trees, snags and no harvest buffers along streams and forest stands in stages from newly planted seedlings to mature trees. Visual sensitivity levels range from high to low

across the forest. In high sensitivity areas, such as those designated as visually sensitive by the Oregon Forest Practices Act, management activity may not be highly evident and visual objectives have a higher priority when balancing resource considerations. Whereas in low sensitivity areas, the management activity is prioritized and visual objectives are considered only when compatible with meeting harvest plans, operational needs and other resource priorities. Harvest areas are screened during the planning process to determine if they are within a scenic highway corridor or within a quarter mile of scenic waterways. If a harvest operation falls within these areas, collaboration is done with Oregon Department of Transportation or Oregon Parks and Recreation Department to ensure the proposed management activity is developed to meet the requirements for these areas. These visual buffers are balanced with goals for maintaining safe conditions for motorists and recreationists. Occasionally, ODF is contacted by the Oregon Department of Transportation or power companies concerning trees they deem to be a hazard to public safety, power distribution, or infrastructure. ODF works collaboratively to mitigate any identified hazards.

State forests are working forests, and it is inevitable forest management activities will interact with adjacent landowners. The Department of Forestry recognizes harvesting timber alters the physical environment, which may be viewed as a temporary negative impact to neighbors. District staff will engage with adjacent landowners during sale layout to identify potential concerns and work through solutions where safety and operational considerations allow.

AQUATIC, WILDLIFE, AND PLANT COMMENTS

Aquatics: A number of comments were received regarding riparian area management, aquatic anchor strategies and stream enhancement projects. Comments received included:

- Several recommendations to prohibit timber harvest within Riparian Conservation Areas.
- Concerns about proximity of clearcutting activities adjacent to Riparian Conservation Areas and the impacts to water quality, soil stability, and wildlife habitat.
- Allowing clearcutting in riparian conservation areas can exacerbate erosion, increase water temperature, and compromise the integrity of aquatic habitats.
- Commenter noted that the stream layers used in the Pre-Operation Reports need further review. Many of the streams are not physically present in the field or are potentially mislabeled.
- It appears that there are some areas that contain streams or wetlands that lack riparian protections according to the AOP maps.
- Aquatic Anchors should be evaluated for cumulative effects of harvesting on water quality and stream temperatures to better respond to pressures of climate change.
- Proposed clearcuts within Aquatic Anchors should be drastically reduced, revised to partial harvests or cancelled to maintain the ecological integrity of waterways, protect water quality and stream temperatures and support aquatic biodiversity.
- Clearcutting in close proximity to Aquatic Anchors can result in increased sedimentation, habitat degradation, and water pollution, jeopardizing the health of aquatic ecosystems and the species that depend on them.
- Opposed to road construction within or near aquatic anchors.

- Provide specific project details which include goals for habitat enhancement and restoration, discuss prioritization methods, and provide firmer commitments for enhancement projects in AOPs.
- Protect habitat and rehabilitate the salmon fishery.

Wildlife and Plants: Wildlife and habitat protection comments received included:

- Cancel proposed harvests and prohibit roadbuilding within historic and currently active Northern Spotted Owl and Marbled Murrelet territories.
- Timber harvest results in the loss of native plant and animal habitat.
- Support to designate certain areas for wildlife but recommendations limiting how many areas there are.
- Prohibit logging in northern spotted owl habitat and provide adequate old growth forests for the recovery of the species.
- Cancel or postpone logging in critical habitats for amphibians and birds.
- Support for ODF's plan to follow policy to develop new Marbled Murrelet Management Areas based on the survey information, including adjusting sale boundaries and harvest activities so they are outside the established Marbled Murrelet Management Areas.
- Prohibit logging on land set aside for endangered animals that depend on old growth forests.
- Clearcut sites in the Astoria district have been insufficiently assessed as potential crucial habitat for the Columbia torrent salamander and marbled murrelet.
- Proposed clearcuts and fragmentation will impact bald eagles, beaver, blue heron, cougar, bobcat, coyotes, native plants, and waterways for native salmon.
- Stands that show promising signs of old-growth forest characteristics should be protected for the recovery of the marbled murrelet.

AQUATIC, WILDLIFE, PLANT RESPONSE:

Aquatic Protections: ODF implements riparian management and conservation strategies, stream enhancement projects and best management practices for roads and slopes, to promote the development of functional riparian forests with large healthy trees that provide shade, contribute to instream habitat complexity, and protect important riparian functions, ecological processes and water quality and quantity. This includes measures such as riparian stream buffers, process protection zones and equipment restriction zones to protect fish bearing, non-fish-bearing, perennial and seasonal streams that serve important functions supporting aquatic habitat quality both within these waterways and affecting downstream waters.

Riparian stream buffers (Riparian Management Areas and Riparian Conservation Areas) are applied to streams based upon on fish presence, stream size, and flow duration. Stream location, fish presence and stream seasonality are determined on all streams prior to selling a timber sale. Where possible, this work is completed prior to composing the Annual Operations Plan . In limited situations, stream locations, seasonality or fish presence surveys are not completed prior to the public comment period. When this occurs, those streams are identified as unknown and highlighted within the sale specific Pre-Operations Report to ensure stream classification will be finalized during sale layout.

In addition to implementing the riparian stream buffers based on the appropriate Forest Management Plan requirements, the operations outlined in the FY25 AOP that have State Forests west of the Cascades are implementing the requirements of the draft Habitat Conservation Plan. Suitable habitat and protection measures are provided for the covered fish and slender and torrent salamander species by applying no harvest Riparian Conservation Areas (riparian stream buffers) identified in the draft Habitat Conservation Plan as agreed upon by the National Oceanic and Atmospheric Administration and United States Fish and Wildlife Service. Conservation actions in the draft Habitat Conservation Plan were developed in collaboration with United States Fish and Wildlife Services, National Oceanic Atmospheric Administration Fisheries, Department of Environmental Quality, Oregon Department of Fish and Wildlife, Oregon Department of State Lands, and Oregon State University.

Aquatic Anchors: In addition to the riparian stream buffers discussed above, and within the designated Aquatic Anchors, no harvest zones will be extended out to 50 feet when regeneration harvesting is located near small perennial, debris flow-prone, and high-energy non-fish streams as outlined in the State Forest Division Species of Concern policy. Aquatic Anchor sites are geographically identified watersheds where salmon and aquatic conservation is of particular concern as part of Species of Concern policy associated with the Northwest and Southwest State Forests Management Plans. In these areas, additional riparian management strategies are implemented when conducting regeneration harvest operations. These strategies do not preclude or limit harvest or road building activities, but rather supplement existing riparian stream buffer protections to further bolster the conservation goals in these areas. While working in these Aquatic Anchors, operations follow the current forest management and implementation plans and policies, which include the draft Habitat Conservation Plan requirements during this transitional stage.

Domestic Water: All harvest areas are screened for domestic water point of diversions within or up to 3,000 feet downstream of the harvest area as per the Oregon Forest Practices Act using registered water rights data from the Oregon Water Resources Division. The streams with domestic water points of diversions on state forest lands are protected in accordance with the Oregon Forest Practices Act, Oregon Department of Environmental Quality Clean Water Act, State Forests Management Plans and where applicable the draft Habitat Conservation Plan.

Stream Restoration: State Forests has been committed to implementing stream enhancement projects 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 current riparian management area standards are designed to collectively improve processes and function of aquatic ecosystems over time, and ultimately benefit resident and anadromous aquatic species.

In order to focus stream enhancement efforts where they will have the most uplift to aquatic species, the staff aquatic and riparian specialist utilizes desktop and field reviews to develop stream enhancement projects, often in collaboration with ODF districts, Oregon Department of Fish and Wildlife, and local watershed groups. Other local prioritization documents such as Coho Strategic Action Plans, Rapid Bio-assessments, Watershed Assessments, etc. are utilized where available to help inform and focus enhancement efforts. Each year specialists review multiple potential stream enhancement opportunities – those that have a nearby timber sale, as well as those proposed by local partners. Thus,

it is important to manage staff capacity efficiently and focus on sales in approved Annual Operations Plans.

ODF is working towards improving the timing of the stream enhancement planning process to provide more details in the Annual Operations Plan for the public to review in the future. As the transition into the requirements outlined in the draft Habitat Conservation Plan occurs, processes and reporting will change. In addition, ODF will begin working on new Implementation Plans for the Western Oregon State Forests Management Plan once it has been finalized. During this Implementation planning process, the processes and reporting for stream enhancement will be determined.

Wildlife and Plants: State Forests provide habitats for a wide variety of native wildlife and plant species across the landscape. The current district Implementation Plans discuss common species that are present including Species of Concern. Species of concern are those species on federal or state Endangered Species Acts lists, state sensitive species, and Oregon Conservation Strategy species found in each district. During the planning process, Biologists use several wildlife databases and the Oregon Biodiversity Information to identify potential interactions between harvest operations and species of concern that need to be addressed. In addition to these screens, the Biologists review all harvest operations for potential marbled murrelet and northern spotted owl habitat and survey as required until such time as Incidental Take Permits are issued and implemented by ODF. For harvests that are located within known marbled murrelet management areas or northern spotted owl circles, Biological Assessments are developed by the Biologists and consultations are conducted with the U.S Fish and Wildlife Service to ensure that harvest prescriptions are in alignment with policies.

Some of the strategies to address habitat needs include: the use of silvicultural tools to attain an array of forest stand structures and habitat types across the landscape; Terrestrial Anchor Sites; Aquatic Anchors; development of key structural components such as snags, green trees, and down wood; riparian and aquatic strategies including riparian management standards, upslope components such as road and slope stability strategies as well as stream restoration projects; and site-specific plans or modified practices such as modified harvest prescriptions or practices, seasonal restrictions, site specific actions such as leaving slash piles, buffers and resource site protection. The Eastern Region Long-Range Forest Management Plan uses strategies such as Critical Wildlife Habitat Areas, Forest Connectivity Areas, road closures, key structural components and site-specific plans to address wildlife habitat protection. The Biologists work with field staff during sale planning and layout to implement strategies where needed to meet habitat objectives.

In addition to the strategies described above, the draft Habitat Conservation Areas were delineated using current and historic locations and habitat for marbled murrelets, northern spotted owls, and other covered species to maximize protection of existing habitat. Riparian Conservation Areas were designed to conserve and maintain riparian habitat for protection and persistence of amphibian and aquatic covered species. The conservation strategies in the draft Habitat Conservation Plan were developed by a team with representatives from Oregon Department of Forestry, Oregon Department of Fish and Wildlife, Oregon Department of Environmental Quality, Oregon Department of State Lands, Oregon State University, U.S. Fish and Wildlife Services and National Oceanic Atmospheric Administration Fisheries.

ROADS, SLOPES, AND WATER QUALITY COMMENTS

Roads and Slopes: Road construction and harvesting on steep, landslide-prone slopes comments received include:

- No road building or logging should be allowed on steep, landslide-prone slopes that have the potential to degrade water quality and spawning habitat.
- AOPs promote clearcut logging on steep slopes as well as expand an excessive existing road network, which in turn poses landslide and related risks to already compromised water and habitat quality.
- Opposed to harvesting on steep slopes due to potential erosion and landslides as well as safety and water quality concerns.
- Additional regulations are needed on clearcut harvests adjacent to streams and houses in Tillamook County that are on steep hillsides above communities.
- Deep-seated landslide features, areas identified in geotechnical hazard mapping layer, recent slides, previous geological events should not be included within proposed sales.

Water Quality and Quantity: Water quality, quantity and the use of herbicides was a topic of concern. A number of comments were received including:

- Protect water quantity as well as quality.
- Drinking water is an equally important forest resource and requires protections.
- There are cumulative effects from harvests on water quality and impacts to watersheds.
- Potential for sediment, pesticides, and herbicides to entering rivers in surface runoff from the clearcut due to the steepness of slopes in the harvest area.
- Soil compaction from harvesting decreases the soil's ability to retain water causing drought and/or flooding reducing supply of clean water.
- Stop pesticide and herbicide applications on State Forests.
- Use of herbicides on state forests should be phased out as they are not necessary for the productive growth of conifers and harms insects, mammals, salamanders, fish, and drinking water.
- Harvest and pesticide applications near and upslope of all water sources should be curtailed.
- Chemicals damage ecosystems through erosion and landslides leaching chemicals into the soils and water.
- Prohibit harvest, pesticide and herbicide applications upslope of drinking water sources.
- Old growth forests have higher streamflow compared to young stands converted to Douglas-fir dominated plantations which impacts stream quantity and quality.
- Aerial spraying should be replaced with on-the-ground applications of herbicides when necessary.
- Protect all watersheds that provide community water resources by eliminating the use of herbicides for site prep, regulating the amount of fertilizer applied and reduce or eliminating the use of chemicals on all watersheds.
- Annual Operation Plan should list the actual chemical ingredients of the herbicides, rodenticides and other pesticides that will be used.

- Harvesting impacts vital habitat, salmon industry, aquifer levels, and causes public utilities to upgrade water purification infrastructure.
- Health concerns around proposed pesticide use. Information (chemicals and timing) should be available to public.
- Effects from spray on adjacent landowners' gardens, livestock, apiary, pollinators, and people.
- There should be 2-mile spray buffers for all residences and waterways.
- Use existing mapping of domestic and municipal water sources to avoid harvest and pesticide applications near and upslope of all water sources.
- Herbicides are used to eliminate deciduous trees which are more resilient to fire.
- Address drinking wells within 3000' feet of harvest.
- ODF should have a means to self-report water source locations because they are not recorded by other State Agencies.

ROADS, SLOPES, WATER QUALITY RESPONSE:

Roads: 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. The road system on state forest lands is managed to keep as much forest land in a natural, productive condition as possible while limiting impacts to resources in accordance with the current Forest Management plans, draft Habitat Conservation Plan (where applicable), ODF guidance, best management practices, Oregon Forest Practices Act, and other applicable laws. The draft Habitat Conservation Plan does not prohibit road building inside Habitat Conservation Areas. Road construction in Habitat Conservation Areas will occur where economically or operationally feasible options outside of Habitat Conservation Areas are not available. Road construction within Riparian Conservation Areas is limited to where upland road placement options don't exist, are infeasible or cost prohibitive. Road design specifications and best management practices will be followed to reduce impacts from roads. ODF evaluates each timber sale and strives to use the existing transportation system to minimize new road construction and reduce impacts, and to address and mitigate identified issues. 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. 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 operational objectives.

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. Best management practices are followed during forest operations such as road building, harvesting, trail construction, and site preparation to minimize soil compaction, protect soil structure and prevent erosion and loss of organic materials. 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. Every operation is evaluated for locations of greater landslide potential. Trees are retained on identified locations to provide for continued canopy cover and root stabilization of soils. If in the future these sites fail, wood delivery to the stream network will continue as it would have naturally. As part of this project review, homes and/or roads that exist below proposed operations with steep slopes

are evaluated for landslides and their relation to public safety. The proposed operations have been reviewed under the existing Forest Management Plans, the draft Habitat Conservation Plan, the Oregon Forest Practices Act, and Coho Settlement Agreement requirements. These requirements provide robust aquatic and riparian buffer rules and 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. To ensure that these requirements are met a combination of tactics may be used to evaluate operations including using landscape-wide slope stability models and site-by-site reviews in the field by a licensed geologist. ODF strives to complete geotechnical reviews prior to finalizing district Annual Operations Plans, however, some field consultations can't be completed prior to finalizing the Annual Operations Plans 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.

Water Quality/Herbicides: All harvest areas are screened for domestic water point of diversions within or up to 3,000 feet downstream of the harvest area using certified water rights data from the Oregon Water Resources Division. The streams on state forest lands are protected in accordance with the State Forest Management Plans, draft Habitat Conservation Plan (where applicable), Oregon Forest Practices Act and Oregon Department of Environmental Quality Clean Water Act. ODF implements riparian management, stream buffers and riparian conservation strategies to protect important riparian functions, ecological processes and water quality. This includes measures to protect non-fish-bearing and seasonal streams that serve important functions supporting aquatic habitat quality both within these waterways and affecting downstream waters. The protection and management measures described here and under Stream Buffers, Stream Enhancement, Roads, and Slopes in this document all work together to promote the development of functional riparian forests with large healthy trees that provide shade, contribute to instream habitat, and improve water quality and quantity.

Determination about herbicide use and type is done for each individual stand on a site-specific basis after the unit has been harvested and the brush development for the area is better known. Harvest sites by law must be replanted, and ODF strives to use the minimum amount of herbicides necessary to achieve reforestation success. ODF plants a mix of different tree species, which will also affect if/when/what herbicides are used. After harvesting, vegetation that competes with newly planted trees rapidly re-colonizes harvest units. Herbicides can be 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 to protect water quality, wildlife, and neighboring landowners. Licensed Contractors are hired to apply herbicides on ODF lands and are closely monitored by ODF contract administrators (who are also licensed applicators). ODF uses ground-based applications where practical. However, shifting to primarily ground-based applications would significantly increase costs and presents physical hazards to crews working on steep slopes. ODF encourages all concerned citizens to sign up in FERNS for notifications (options include notification of operations, location, timing, types of chemicals, change of status, etc.) as this is the easiest way to stay informed on upcoming operations.

SPECIFIC SALE COMMENTS

In addition to the comments that are summarized above, we received specific comments on individual sales on the Astoria, Forest Grove, North Cascade, Tillamook, West Oregon, and Western Lane Districts. These specific concerns and recommendations covered a wide range of topics including: changing timing of sales, finding alternate sales, canceling harvests, doing more harvests, modifying harvest types and leave tree strategies, changes to desired future condition, harvest challenges, green strip buffers, modifying pesticide application plans, cultural and historical resource protections, additional resource protections (wildlife, water, plants, soils, unstable slopes, public safety, scenic, etc.), stream location/duration errors, road project modifications and road rocking considerations, marketing strategies, tethered logging recommendations, , considerations for adjacent landowners, or providing additional information for consideration.

SPECIFIC SALE RESPONSE:

All of the sale specific comments have been reviewed and considered by ODF staff. Some of the individual comments have resulted in no changes while others have prompted adjustments or will be further considered as projects are laid out in the field. Changes that have been made since the public comment period have been documented in the last section of this document and in Appendix "D" of each district Summary Document.

PROCESS AND DOCUMENT IMPROVEMENT COMMENTS

- Website is hard to navigate to find the plans and some links were broken making it difficult to provide comment.
- Public comment period is too short to work through issues and get questions answered and when meeting requests get denied.
- Lack of communication and notification for adjacent landowners is concerning and does not allow for meaningful input from affected parties.
- Future Annual Operation Plans should include mapping of all domestic and municipal water sources.
- Additional biological reports about wildlife, fish, and plants including survey data, geotechnical and archaeological reports should be included in AOP documents.
- Provide a clear explanation in documents of what ODF means by 'non-complex' future conditions.
- ODF needs to provide more information in the AOPs describing how ODF selected specific HCAs for logging, including providing data about the current condition of the stands, explaining why the prescribed logging is necessary to improve habitat and how the proposed timber sale would meet the biological goals of the HCP.
- Include specific description of re-planting in pre-ops.
- Add information to documents that explain the anticipated external costs including potential increases in atmospheric greenhouse gases, social costs, and comparisons with potential market value.
- Provide a transparent record of decision-making and include documentation that best available science was examined regarding the costs to society from the proposed logging.

- Document the cost/benefit of the alternatives considered to the plan, and the selected the management option that will maximize net public benefits.
- Include adjacent landowners in other considerations and address concerns about noise, risk to homes, exhaust, environmental noise, exhaust gases from heavy equipment, and removal of rock applied for logging equipment access.
- Update the section titled Climate Change and Carbon Storage to include ODF's practices of sustainable, climate-smart forestry through sustainable forest management and harvested wood products directly sequester and store carbon and support efforts to lessen the impacts of climate change.
- Requests for tours and meetings with different groups and/or public to discuss operations, ask questions, and tout proposed logging units located in HCAs once marking is complete.
- Provide clarity on timber management targets and describe harvest objectives in terms of volume delivered for sale.

PROCESS AND DOCUMENT RESPONSE:

ODF strives to provide useful and detailed information during the Annual Operations Plan process for the public to review and provide feedback. This information is also intended to provide links to higher level Plans and processes. ODF constantly strives to improve the Annual Operations Plan documents and make them more useful and accessible by considering comments received and incorporating them where appropriate. All the comments that target process and document improvements will be evaluated and considered for improvements during the FY26 Annual Operations Plan process.

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:

- Concern over approving 3,500 acres of logging within Habitat Conservation Areas recommending that this decision be reversed.
- Concern that expected future harvest volume from Habitat Conservation Areas will not be met since FY25 volumes are lower than modeled harvest volumes.
- Recommend that State Forestry Board mandates a set of truly sustainable forest practices that allow us to actually maintain the State Forest as a "forest ecosystem" to provide the essential services- clean water, timber, rich biodiversity, soil stability and clean air as well as recreational and cultural benefits.
- ODF should adopt a broad-scale policy of thinning stands for forest quality in the pursuit of stable state revenue over the long haul rather than clear cutting them for maximal harvest yield in the short term.
- Logging is Oregon's largest generator of climate pollution and climate pollution will far exceed logging revenue and will harm people.
- Observation that burned green trees left in harvest operations and across the district after the 2020 Labor Day wildfires are experiencing late mortality, beetles, and termites. Green tree requirements were too optimistic and most of those trees ended up dying and could have been harvested with the rest of the sales resulting in more harvest volume, revenue, and restoration

of burnt stands. Recommendation to harvest green trees when salvaging units post-fire to reduce the prevalence of this situation occurring in the future.

- In order to be safe around trees, we need to retreat our communities to smaller areas instead of expanding our footprint right into the forest areas.
- ODF requires a different model for revenue. State-owned lands shouldn't continue the practice of selling dead trees for revenue.
- Instead of sending trees away, keep the lumber local to be used for affordable housing and to support local jobs and economy.
- Raise timber taxes to align more with Washington and California tax structures to earn more money for Oregon Schools.
- Nobody is clearing brush or enforcing brush abatement rules around Shady Cove, Oregon.
- Deer are undersized and need to not be hunted in the same areas every year so that they have time to grow.
- Reduce harvest on forests by having big corporate players pay their fair share of taxes to help support counties and local communities.
- This Annual operation plan is an opportunity to move an area that is adjacent to property owners and/or drinking water and trade it for areas of comparable age and volume within the existing Habitat Conservation Areas.
- Consider moving the Habitat Conservation Areas around to lessen the negative social impacts that harvests have on the community.
- The Board of Forestry failed to understand their decision to move forward with the draft HCP in March because of shielded and biased data presented to them by staff.
- ODF and policymakers should advocate for the draft HCP to be approved as soon as possible and finishes work on the new Forest Management Plan so policies and new Implementation Plans can be adopted together.
- The new Forest Management Plan should not place more burdens or restrictions on state forests than what is required under the draft Habitat Conservation Plan.
- Concern that the Board of Forestry recently adopted the Habitat Conservation Plan, performance measures and critical habitat is being ignored.
- Concern that sales like Moth Ball Hill are being proposed to offset limited availability of harvest in other areas due to the draft Habitat Conservation areas.
- Concern that Habitat Conservation Plan will truly provide the greatest permanent value for Clatsop County residents. The potential environmental and economic impacts must be carefully weighed against any perceived benefits.
- Concerns of biased planning for the draft Habitat Conservation Areas by including historical survey results for the covered species has skewed the comprehensive landscape design approach and resulted in collisions of resource values.
- Support for the large areas that have been and will be set aside as habitat reserves under current management and the proposed HCP and recommendations to add additional areas.
- Concern by the inclusion of recently clearcut stands in the Habitat Conservation Areas while adjacent mature stands with trees over 80 years old were excluded from the Habitat Conservation Areas.

DISTRICT SPECIFIC CHANGES

The following is a summary of changes that have been made to FY25 Annual Operations Plan documents based on the feedback that was received and new information that we have learned:

Astoria District

Primary/Alternate Changes:

- Added ODR and Tin Man Alder to Primary List (approved FY24 sales).
- Mothball Hill moved to Alternate.

Annual Operation Reports:

- Updated Management History for the following sales: Davis Ridge, Easy Wages, Gazoo Combo, Hawkins, Mothball Hill, Scout Walker, Simply Simmons, Slough Hill, Tide Flats, Wild Gander.
- Other Considerations – Adjacent Landowners added on the following sales: Davis Ridge, Mothball Hill, Pipeline Split, Simply Simmons, Slough Hill, Tide Flats, Toto, Wild Gander.
- Geotechnical Tables updated for the following sales: Easy Wages, Pipeline Split, Hawkins, Mothball Hill, Scout Walker, Slough Hill, Wild Gander.
- Property Line Survey information updated on the following sales: Davis Ridge, Pipeline Split, Mothball Hill, Simply Simmons, Slough Hill, ODR, Tin Man Alder.
- Modified Sale Quarters
- Other Individual Sale Edits
    - Davis Ridge
        - Added Invasive species (knotweed/bamboo) to forest health concerns.
    - Hawkins
        - Added a rock replacement project on Nicolai Mainline.
        - Updated project costs to reflect new rock replacement costs.
    - Pipeline Split
        - Updated Other considerations to include the following:
            - Utility Lines
            - Volume/value variability
            - The potential to combine sale with ODR
    - Mothball Hill
        - Updated Map to reflect Geotechnical table changes.
        - Updated Other Considerations to include the following:
            - Powerlines
            - Information on spray plans
        - Updated Scenic to add additional detail for harvest adjacent to highway.
        - Added invasive species (knotweed/bamboo) to forest health concerns.
        - Added additional clarification to points of diversion in proximity to sale.
    - Slough Hill
        - Updated Scenic to indicate “Yes” as identified in existing verbiage.
    - Triple Divide
        - Updated acreage and values to account for the addition of a Green Tree Retention Area.

- Updated Map to show Green Tree Retention Area.

- ODR (Changes from FY24 AOP)
  - Updated format of FY24 sale to look similar to FY25 format.
  - Removed potential stream enhancement based on field review.
  - Updated property line survey information to reflect field review.
  - Updated Domestic water to reflect field review.
- Tin Man Alder (Changes from FY24 AOP)
  - Updated format of FY24 sale to look similar to FY25 format.

Summary Tables: Updated to reflect Annual Operating Report changes.

Summary Document: Updated to reflect Annual Operating Report changes.

Forest Grove District

Primary/Alternate Changes: None

Annual Operation Reports:

- Geotech buffers added to the following Alternate Sales: North Sun, Rap Reimer, and Standard Bearer.
- The Pre-Operations Reports, Maps, Summary Tables and the Summary Document have been updated to reflect the above changes.
- Pre-Operations Reports for all Sales - Management History language updated for clarification of past management of stands.

Summary Tables: Updated to reflect Annual Operating Report changes.

Summary Document:

- Updated to reflect Annual Operating Report changes Work Order Contracts:
- Rock Creek Crushing Work Order Contract Project dropped and replaced with Seven Cedars Crushing Work Order Contract. District Staff, Recreation Education and Interpretation staff and Resource Specialist review of change has been completed.

Klamath Lake District:

Primary/Alternate Changes: None

Annual Operation Reports: None

Summary Tables: None

Summary Document: None

North Cascade District:

Primary/Alternate Changes: None

Annual Operation Reports:

- Updated language in the Pre-Operations Reports for clarification and to better represent previous management history.
- Adjacent landowner language was added to the Pre-Operations Reports for consistency with other Districts.

Summary Tables: None
Summary Document:

- Minor wording changes to Summary Document for accuracy and clarification.
- Summary Document was updated to reflect the changes made to the Pre-Operations Reports.

Tillamook District:

Primary/Alternate Changes: None

Annual Operation Reports:

- Geotechnical buffers added to the following sales: Cronin Too, Kong Returns, Standard Grade South, Trask Joy, and Zig Zag Road.
- The Pre-Operations Reports, maps, Summary Tables, and the Summary Document have been updated to reflect the changes above.
- Pre-Operations reports have been updated to note any adjacent land ownership, as well as some minor updates to past management history.
- Clarification added to the Archer's Road Pre-Operations report regarding the acres currently shown as "No Harvest – Other."

Summary Tables: Updated to reflect Annual Operating Report changes.

Summary Document: Updated to reflect Annual Operating Report changes.

West Oregon District:

Primary/Alternate Changes: None

Annual Operation Reports:

- Bon Thin Bon (Alternate sale): Potential murrelet habitat was identified adjacent to the sale. The Harvest Operations Layer has been updated to show an area of No Harvest – Other until the exact location of any habitat trees can be identified, or alternate prescriptions can be performed to alleviate survey concerns. Pre-op and map were updated to reflect the change.
- Updated language in the Pre-Operations Reports for clarification and to better represent previous management history.
- Adjacent landowner language was added to the Pre-Operations Reports for consistency with other Districts.

Summary Tables: None

Summary Document

- Minor wording changes to Summary Document for accuracy and clarification.
- Summary Document was updated to reflect the changes made to the Pre-Operations Reports.

Western Lane District:

Primary/Alternate Changes:

- North Pontious Salvage Unit – Dropped
- Ice Damage Salvage Sales - changed from Alternate to Primary
- Due to the Ice Damage Salvage Sales being changed to Primary, Sitka Stratus has been split into

2 Sales:

- Units 2 & 3 – remain as Sitka Stratus (Primary)
- Unit 1 now named Sit Back (Alternate)

Annual Operation Reports:

- Ice Damage Salvage Sales:
  - Cultural Resource Review completed on all Ice Damage Salvage Units.
  - Bald Hill, Chicken Bone, Salvage Deed, Tilden 26, & Tilden Switchback – updates made to sale polygon after additional field work completed. Updates made to Pre-Operations Report, Maps, and Summary Document.
  - Pre-Operations Reports for all Sales - Management History language updated for clarification of past management of stands.

Summary Tables: Updated to reflect Annual Operating Report changes.

Summary Document: Updated to reflect Annual Operating Report changes.