



# Oregon

Theodore R. Kulongoski, Governor

## Department of Forestry

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

June 9, 2008

Donald Fontenot  
State Lands Issue Coordinator  
Oregon Chapter Sierra Club  
2950 SE Stark Street, Suite 110  
Portland, OR 97214



Dear Mr. Fontenot,

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

### **Greatest Permanent Value Rule and Best Available Science**

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

(1) As provided in ORS 530.050, "greatest permanent value" means healthy, productive, and sustainable forest ecosystems that over time and across the landscape provide a full range of social, economic, and environmental benefits to the people of Oregon. These benefits include, but are not limited to:

- (a) Sustainable and predictable production of forest products that generate revenues for the benefit of the state, counties, and local taxing districts;
- (b) Properly functioning aquatic habitats for salmonids, and other native fish and aquatic life;
- (c) Habitats for native wildlife;
- (d) Productive soil, and clean air and water;
- (e) Protection against floods and erosion; and
- (f) Recreation.

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

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

[http://egov.oregon.gov/ODF/STATE\\_FORESTS/2009\\_AOP\\_Draft.shtml#Northwest\\_Oregon\\_Summary](http://egov.oregon.gov/ODF/STATE_FORESTS/2009_AOP_Draft.shtml#Northwest_Oregon_Summary)

In the IP's each District has determined and defined a sustainable timber harvest. There will be variations each year in the types of harvest and acres harvested but the AOP will be within the harvest ranges defined in the IP. The Tillamook District's IP can also be viewed at the following website:

[http://egov.oregon.gov/ODF/STATE\\_FORESTS/District\\_Implementation\\_Plans.shtml](http://egov.oregon.gov/ODF/STATE_FORESTS/District_Implementation_Plans.shtml)

Since adoption of the IP's there have been a variety of research, monitoring, and inventory efforts that have led to a change in the proportion of regeneration harvests that have been planned over the last several years for the Tillamook district. The Tillamook district IP was developed using the best information on Swiss needlecast (SNC) available at the time. Since then ODF has partnered with Oregon State University (OSU) and the Swiss Needlecast Coop to find better methods to evaluate the growth, or loss of growth, that is occurring in the SNC infected stands.

OSU studies have shown that the method used to evaluate SNC stand health, by color and needle retention, was not a reliable way to evaluate the stand. The SNC stands that were thinned did respond favorably to the thinning even if they looked bad. OSU is also working on developing an evaluation tool to help determine how a stand is growing as compared to a healthy stand. This tool should allow stands to be evaluated by the rate they are presently growing compared to their potential growth, which will give foresters better information for determining whether to continue to manage a stand or to start over.

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

[http://egov.oregon.gov/ODF/STATE\\_FORESTS/Reports\\_and\\_Research.shtml](http://egov.oregon.gov/ODF/STATE_FORESTS/Reports_and_Research.shtml)

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

[http://egov.oregon.gov/ODF/STATE\\_FORESTS/District\\_Implementation\\_Plans.shtml](http://egov.oregon.gov/ODF/STATE_FORESTS/District_Implementation_Plans.shtml)

#### **Clearcuts Proposed in the Tillamook 2009 AOP**

The management strategies in the NWFMP describe the range of regeneration stand structure across the future landscape. This is defined more specifically in each District IP. Harvest units may be configured in a variety of shapes and sizes, including large clearcuts. The topography, vegetative condition, transportation network and logging systems of the operational areas selected for the 2009 AOP are better suited for larger harvest units. The FPA allows clearcuts up to 120 contiguous acres, and all of the harvest units proposed in the 2009 AOP are compliant with that requirement.

Clearcut harvest is being used as a tool to re-establish stands in General and Desired Future Condition (DFC) Complex designation. Existing/Current stands may be shown on the IP map as

DFC Complex but current conditions do not allow the stand to be managed for the structure. On page 4-48 of the NWFMP is defined conditions when regeneration harvests are appropriate for areas designated for a DFC of Complex structure. Some example stand conditions which are being clearcut harvested but designated as DFC Complex in the Tillamook District's 2009 AOP include:

1. Dense conifer stands that have missed the opportunity for density management (thinning)
2. Hardwood dominated stands
3. Off site seed source and/or impacts due to Swiss needle cast

### **Thinning in Marbled Murrelet Management Areas**

#### **Hansen Falls timber sale**

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

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

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

### **Proposed Operations in the Kilchis Basin**

#### **Peak Out timber sale**

The current condition of the Peak Out sale is Understory (UDS) and the DFC of the stand is Layered (LYR). The stand is classified as UDS because there is an understory of multiple species growing under the hardwood. Hardwoods allow enough light to the forest floor to allow forbes and shrub species to grow but do not allow enough light for new conifer trees to be established. Conifer which were established at the same time as the hardwood do persist in the stand, either in the overstory where they were able to compete with the hardwoods or in the understory where they receive enough light to survive but not to flourish.

The sale area consists of an alder stand with scattered conifer either as single trees or as dense clumps of 1 to 7 acres in size. The hardwood stand is approximately 40 years old and has started to deteriorate in some areas. The plan for the Peak Out sale is to establish a multi-layered conifer stand in place of the hardwood stand with scattered conifer. The conifer, both scattered and in

clumps, will be kept for stand structure and the alder and some conifer harvested in order to open up planting sites to establish a new cohort of conifer.

The prescription for the Peak Out sale will retain approximately 14 green trees per acre in clumps and scattered and consisting of a variety of species and diameter classes, with the overall objective of creating a multi-layered conifer stand as the long term vision. A mixed conifer stand will be planted and natural regeneration is expected from the residual trees.

The alder greater than 10" DBH will be harvested and the pockets of conifer (hemlock and Douglas-fir) will be partial cut using a diameter limit prescription. The diameter-limit prescription is used when the conifer are very tall and have poor live crowns and height-to-diameter ratios. By cutting the trees with small live crowns (30% or less of total height) and smaller diameters in relation to their heights, this will leave trees with healthy live crowns and of a larger diameter, which are more windfirm. Cedar, spruce, and unmerchantable hardwood will be reserved in the stand.

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

#### **Fitch Creek timber sale**

The Kilchis basin has the requirement for 15 percent regeneration structure in its landscape design. The Fitch Creek operation in particular has been selected because:

- This area is classified as General in the Landscape Design.
- Currently, there is little Regeneration structure in the basin to provide for species dependent upon open habitats. Less than 5% is in Regeneration structure.
- Many of the areas within this operation were planted at the same time with no density management resulting in dense stands of small diameter trees. Stand growth has slowed to the point where it will not quickly respond to density management.
- As stated prior, due to terrain and stand conditions, these sale areas are operationally better suited for clearcutting compared to thinning.
- The operation is a first entry management in the Fitch Creek basin and developing the transportation system has very high access costs.

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

#### **Landscape Design on the Tillamook District**

The district does not disregard the landscape design contained in the IP. The District staff does realize that there are several methods/routes to accomplishing the arrangement and extent of Complex structure displayed by the map in the IP. Some of these methods are not the expected

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

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

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

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

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

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

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

Sincerely,



Andy White  
Acting District Forester  
Forest Grove and Tillamook Districts