



Western Lane District Veneta Unit

Implementation Plan (IP)

July 1, 2023

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Executive Summary

In October of 2020, the Board of Forestry (BOF) gave direction to the State Forests Division to continue the development of a draft Western Oregon State Forests Habitat Conservation Plan (HCP) and Forest Management Plan (FMP) for Western Oregon State Forests. While the HCP is going through the National Environmental Policy Act (NEPA) process, the Division is focusing resources on the development of the new FMP and supporting Implementation Plans (IPs). These plans are going through a staggered development process as the details of each planning level feed into the next. The draft HCP process is expected to be completed by fall of 2023. The new FMP process is expected to be completed in 2024 and the new IPs for that FMP are expected to be completed in late 2024 to early 2025.

While the current Western Lane District Veneta Unit IP does not expire until 2027, a transition period for fiscal years 2024 and 2025 (July 1, 2023 to June 30, 2025) exists where the current FMP strategies are being implemented and the draft HCP may be approved. This IP needs to be revised to include new information on the unit land base and forest resources and include the components of the draft HCP in order to cover the expected HCP approval timeline. At the time of developing this IP revision, the HCP is a formal public draft document with an accompanying draft Environmental Impact Statement in the federal NEPA process. Finalization of this process and issuance of Incidental Take Permits (ITPs) is expected to occur within FY 2024. In order to cover this transition period, the existing IP will be revised with an expected term of two years, through June 30th, 2025. In order to address the planning uncertainty and risk of timeline adjustments to the long-term planning processes these IP revisions can be extended through an extension memo signed by the State Forester. As this ongoing policy work evolves, ODF will also evaluate new information or changes in direction to determine if adjustments need to be made.

Introduction

The Oregon Department of Forestry (ODF) manages approximately 763,000 acres¹ of forestland throughout the state. Of these lands, 730,000 acres¹ are Board of Forestry lands, which are managed to secure greatest permanent value (GPV) by maintaining healthy and productive forests, providing clean air and water, recreation and outdoor learning opportunities, and diverse native fish and wildlife habitat. Timber from state forests provides local governments with much-needed revenue and supports family-wage jobs. The remaining 33,000 acres¹ are Common School Forest Lands (CSFL). ODF manages these lands for the Department of State Lands to provide the greatest benefit to Oregonians,

¹ These acres are legal acres. All other acres referenced in this document are based on GIS for analysis purposes.

consistent with resource conservation and sound land management strategies. Among these lands is the Western Lane District Veneta Unit.

The *Northwest Oregon State Forests Management Plan (FMP)*, adopted by the Board of Forestry in 2010 is the policy document that guides how these forests will be managed to secure GPV and support the CSFL goals. This implementation plan revision characterizes the overall framework for implementing the FMP during this time of transition.

The Western Lane District Veneta Unit IP guides forest management for all forest resources on the Veneta Unit beginning July 1, 2023. This implementation plan is a major revision of the plan approved by the State Forester in 2017. It is prepared to broadly characterize forest operations, activities and projects that will achieve the intent of the long-range vision of the *April 2010 Northwest Oregon State Forests Management Plan (FMP)* and the provisions of the *draft HCP* over the next few years.

In summary, this implementation plan was developed to:

- Implement current Forest Management Plan strategies;
- Implement the HCP requirements and provisions of the ITP;
- Incorporate new information on the districts land base and forest resources;
- Adjust the mapped landscape design of the desired future condition to incorporate new information;
- Develop a sustainable and predictable harvest level;
- Contribute to financial sustainability necessary to meet plan goals;
- To cover the two-year period of transition between FMPs and new IPs (July 1, 2023 to June 30, 2025), with the option to extend them if needed.

In addition, the management activities conducted under this plan will be consistent with the management strategies in the State Forests Operational Policies and Bulletins. The specific operations and management activities necessary to carry out this IP will be described in annual plans, beginning with the FY24 *Western Lane District Annual Operations Plan (AOP)*.

Unit Overview

Land Ownership

The Veneta Unit manages approximately 25,256 acres of forest in Lane County. The majority of the land managed within the unit is located in the western portion of the county between the Willamette Valley and the Siuslaw National Forest. Approximately one percent of the forestland in Lane County is managed within the unit, whereas the federal government (U.S. Forest Service and BLM) manages 67

percent and private timberlands 23 percent. See the overview map in the Map Section.

Table 1. Veneta Unit Acreage and Percent by County and Fund

County	Board of Forestry	Common School	Total Acres
Lane	24,324 (96%) ¹	932 (4%)	25,256

¹Percent of total unit acres

Physical Elements

Topography

The state forestland is rugged and mountainous. Two thirds of the unit has slopes greater than 40% with half of the unit greater than 65% slopes. In western Lane County, elevations range from 500 to 2,000 feet. In eastern Lane County, state forestlands are on elevations up to 2,600 feet.

Climate

Winters are wet and mild, with little snow most years. State forestlands are no closer than 20 miles to the coast, so summers are warm and dry with only a minor marine influence. Rainfall has been extremely variable this century. For example, Eugene’s annual rainfall in the 1920s was 20 to 30 inches but was more than 100 inches in 1996. On average, Eugene receives 40 to 50 inches, the Coast Range 80 to 100 inches, and the west slope of the Cascades 60 to 80 inches annually. There has also been an increase of extreme weather events throughout the seasons in recent years.

Water

State forests managed in the Veneta Unit are within two sub-regions. The majority of the unit (91.3 percent), is within the Northern Oregon Coast sub-region, which flows towards the coast. This portion of the unit occupies approximately 4.6 percent of the Siuslaw sub-basin. In the Siuslaw system, state forest management activities can affect the headwaters of major tributaries of Lake Creek, such as Nelson Creek and Greenleaf Creek. State forest management can also affect the headwaters of other major streams such as Chickahominy Creek, a tributary of Wildcat Creek, and San Antone Creek, a direct tributary of the Siuslaw.

Approximately 8.7 percent of the Veneta Unit is within the Willamette sub-region, flowing into the Willamette River. State forests are found in three sub-basins

(Upper Willamette, Middle Fork Willamette, and McKenzie) but occupy <0.01 percent within each of them.

There are very few known domestic water systems on or near the forest within this unit. ODF utilizes the Oregon Water Resources Department (OWRD) website to access the most current information for identification of domestic water systems when reviewing planned timber sales, which allows for protection of these sites should any be found.

Geology and Soils

The Veneta Unit is located in the central Oregon Coast Range. The predominant geologic formation in this part of the Coast Range is the Tye Formation which was formed in middle Eocene times approximately 43 million years ago as a turbidite (submarine landslide) deposit of alternating sand and silt beds on the ocean floor. These sediments have since been lithified into alternating sandstone and siltstone beds which have been uplifted from ocean floor depths to as much as ~2,500 feet above sea level in the Coast Range as a result of east-west compression during middle Miocene times (~15 million years ago) in response to the backward (westward) stepping of the proto-Cascadia Subduction Zone. Interspersed throughout the Tye Formation are uncommon basaltic intrusions that represent seamounts, guyots and rare subaerial volcanoes. Relatively gentle folding of the Tye Formation, typically 5 to 15 degrees, generally east-west oriented, when coupled with extensive erosion in the Coast Range has resulted in two major types of structural settings for landslide development; dip slopes and strike slopes. Deep-seated, generally slow-moving landslides such as earthflows and translational slides are common on dip-slopes while shallow, rapidly moving landslides are common on strike slopes.

Soils types developed within the Tye Formation are predominantly within the Clayey Sand to Silty Sand spectrum (SC to SM in accordance with the Unified Soil Classification System) and with moderate plasticity indices, generally below approximately 30. These soils are both near optimum for supporting growth of conifer trees and for producing pore pressures that drive landslides.

Scenic Resources

Areas deemed scenic resources can include lands with established, high public use vistas, viewpoints, or significant natural features; lands immediately adjacent to scenic highways; lands immediately adjacent to scenic waterways; areas adjacent to campgrounds; or lands visible from urban centers. Known scenic resources in the Veneta Unit include:

- Highway 126 (FPA Scenic Highway)
- Highway 36 (FPA Scenic Highway)
- Lake Creek/Jay Road/Hwy 36 (High public use vista)
- Wildcat Creek/Hwy 126 (High public use vista)

Biological Elements

Vegetation

Intense fires swept much of western Lane County in the Walton/Nelson Mountain/Blachly area several times in the early 1900s. Afterward, natural reseeding created vast tracts of almost pure Douglas-fir, now 60 to 90 years old, mixed with multi-stemmed bigleaf maple that resprouted from the roots. In the wetter areas, regenerating red alder generally shaded out the conifer seedlings and created mixed, alder-dominated forests.

The fires were less intense in the Tilden Ridge area south of Deadwood, leaving scattered unburned trees and patches. Much of these remaining trees and patches were logged from 1945 to 1955. Since there was considerable ground disturbance, no tree planting, and no attempt to control hardwood competition, the stands grew up to be mixed conifer and hardwoods of various ages.

The Unit Plant List (Table 2) includes endangered, threatened, candidate, and special concern plants that are, or have the potential to be found, in the unit. This list is an expanded version of the list found in the *NWO Forest Management Plan*. There are no known occurrences of these species on state forest lands within this unit, but each has habitat requirements that may occur on these lands.

Table 2. Veneta Unit Endangered, Threatened or Candidate Plant Species¹

Genus	Species	Common name ²	Status ³	Record exists ⁴	Potential to be present
Threatened and Endangered Plants					
<i>Eucephalus</i>	<i>vialis</i>	Wayside aster	ST	✓	✓
<i>Castilleja</i>	<i>levisecta</i>	Golden Indian-paintbrush	SE, FT SE, FE	✓	✓
<i>Lomatium</i>	<i>bradshawii</i>	Bradshaw's Lomatium	SE	✓	✓
<i>Erigeron</i>	<i>decumbens</i>	Willamette daisy	SE, FE	✓	✓
<i>Lupinus</i>	<i>oreganus</i>	Kincaids lupine	ST, FT		
Plants of Special Concern					
Candidate Plants					
<i>Horkelia</i>	<i>congesta</i>	Shaggy horkelia	SC, FSOC	✓	✓
<i>Cimicifuga</i>	<i>elata</i>	Tall bugbane	SC	✓	
<i>Montia</i>	<i>howellii</i>	Howell's montia	SC		

¹Data Source: Oregon Biodiversity Information Center Database - 2022

²Plant names in bold are on the NWFMP list of plants.

³Status: SE – State Endangered; ST – State Threatened; SC – State Candidate; SP – Special Concern; FE – Federal Endangered; FT – Federal Threatened; FSOC – Federal Species of Concern

⁴Plants have been observed on or within ¼ mile of state forestlands.

Forest Health

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

Climate change, wildfire, poor site quality or suitability for a tree species can predispose trees to damage caused by insects and disease. Silvicultural activities that may be utilized to address forest stressors include:

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

In addition to these techniques forest managers are also working to address several forest health concerns in the Veneta Unit that are described below.

Insects and Disease

Phellinus weirii - is a root disease that affects Douglas-fir trees severely, and western hemlock moderately. The disease is spread when uninfected roots of a susceptible tree grow into contact with infected roots and are colonized by *Phellinus weirii*. For most of the Veneta Unit, root disease is of low concern and is present in sparse, isolated patches comprising less than five percent of the stands throughout the unit. Root disease locations have been identified in the Wolf Creek and Pataha Creek basins.

Swiss needle cast - is a native fungal disease of Douglas-fir. This disease, which causes the premature shedding of needles, has resulted in severe growth reductions in some stands, particularly plantations between 10 and 30 years old. In addition to the growth loss, there is concern that this disease will limit the development of complex forest structures in severely infected stands. For most of the Veneta Unit, Swiss needle cast is of low concern although the exact amount of the disease is unknown at this time. It exists primarily in very small patches in the westernmost portions of the unit and none of the stands are considered to be severely infected.

Emerald ash borer (Agrilus planipennis Fairmaire) – is an insect that primarily targets ash trees. The insect consumes a trees cambium and restricts the trees ability to transport nutrients and water until the trees die. Emerald ash borer is of high concern for areas where it is discovered. The presence of the Emerald ash borer in the Veneta Unit is unknown at this time.

Invasive Weeds

Integrated pest management principles to address incidences of invasive, non-native plants will be applied on state forest land. ODF will coordinate with other agencies and landowners in efforts to address such problems. The district will take steps to assure that management activities are not contributing to existing or new invasions of non-native plant species. These steps will include vegetation management efforts to control such species on state forest land, and the use of native plant species in re-seeding projects on state forest lands.

Most noxious weeds or invasive plants are found along roads and have spread into young stands. The main sources for the weed introduction into the forest are vehicle traffic, equipment moved into and out of unit, and where soil disturbance occurs. ODF requires 100% weed free grass seed and certified weed-free straw used for mulch for forest projects. Equipment washing is required in timber sale contracts to prevent the introduction of weed seed from other sites.

Fish and Wildlife

The Veneta Unit provides habitats for most native species found in forests in the Oregon Coast Range (*Johnson and O'Neil 2001*). Appendix E of the FMP contains lists of native fish and wildlife species that are currently known, or are likely, to exist within the area covered by the FMP. The *Oregon Conservation Strategy*² provides a list of species of concern for each ecoregion of the state. Many of the species listed as “Conservation Species” for the Coast Range ecoregion are likely to be present in the Veneta Unit. In addition, many game and furbearer species occur in the unit. Some of the most common game species are black-tailed deer, Roosevelt elk, black bear, ruffed grouse and mountain quail. Also common are American beavers, mountain beavers, cougars, bobcats and coyotes.

The streams, rivers, lakes, and other water bodies in the Veneta Unit provide habitat for a variety of fish and amphibian species. These aquatic species use habitats in or downstream of the plan area for part or all of their life history.

The integrated forest management strategies, as well as aquatic and riparian strategies, will contribute to diverse habitats that are likely to accommodate most native wildlife species and contribute to the maintenance and restoration of habitat.

Species of Concern (SOC)

Opportunities for additional conservation measures for “species of concern” have been identified in the Veneta Unit. Species of Concern are listed in Table 3 for the Veneta Unit. The list includes those on federal or state ESA lists, state sensitive species, and Oregon Conservation Strategy species for the Coast Range. Information regarding limiting factors and habitat needs was taken directly from *ODFW's Oregon Conservation Strategy (OCS)* for most species. For species not addressed in the OCS, general habitat needs were described based on available research and monitoring. The results of the assessment and development of SOC “course” strategies for the District are presented in Appendix B. Strategies in addition to the *NW State Forests Management Plan (2010)* to address these species are identified in policy and in the HCP. Some of these strategies include:

- The application of silvicultural tools to attain an array of forest stand structures and habitat types across the landscape, in a functional

² Oregon Department of Fish and Wildlife. February 2016. The Oregon Conservation Strategy, Salem, OR. <http://www.oregonconservationstrategy.org/>

arrangement, and the production of stand structural components (e.g., canopy layering, understory development).

- The application of landscape design principles: The landscape design developed for this IP applied landscape design principles to provide a functional arrangement of stand types considering characteristics such as patch size and distribution, fragmentation, corridors, and interior habitat. The result is a landscape design that includes 37 percent of the landscape designated for complex forest structure. See additional information in the “Landscape Design Overview” section of the IP.
- Strategies for northern spotted owls and marbled murrelets are described in State Forest Division Operational Policies.
- Snags, green trees, and downed wood: The FMP, HCP and related strategies, call for active forest management for retention and development of key structural components such as snags, green trees, and downed wood, and the application of targets for these components at landscape scales.
- Riparian and aquatic strategies: the application of FMP and HCP riparian management standards as well as upslope components such as roads and slope stability strategies. Stream restoration projects will be undertaken as resources allow and focus on high priority areas.
- Site-specific plans, or modified practices: In addition to the above “coarse filter” strategies, some species may need additional “fine filter strategies.” If these species are identified within the unit, this will be accomplished through the development of site-specific plans. Fine filter strategies in site plans, or otherwise recommended for consideration, may include modified harvest prescriptions or practices, seasonal restrictions, and buffers and resource site protection.

Safe Harbor Agreement

In September 2016, ODF signed a *Safe Harbor Agreement (SHA)* with the U.S. Fish and Wildlife Service (USFWS) that incorporates northern spotted owl (NSO) sites across approximately 70 percent of state forestlands in Lane County. The SHA defines NSO sites differently than ODF policies had previously and identifies “baseline” and “non-baseline sites” using Thiessen polygons versus provincial home range circles. Take avoidance policies apply to baseline sites. Non-baseline sites and un-designated areas define where incidental take of NSOs is authorized under an Enhancement of Survival permit associated with USFWS-funded barred owl removal activities. ODF will be authorized incidental take of spotted owls through this permit as part of otherwise lawful forest management activities associated with these sites. This permit is valid until August 31, 2026, except that for covered activities related to the harvest of timber sales in non-baseline sites and non-baseline areas outside of Thiessen polygons that are auctioned, sold and

with a contract signed by ODF prior to August 31, 2026, permit coverage will extend to August 31, 2029.

Table 3. List of Fish and Wildlife Species of Concern for Veneta Unit¹

Species	Regulatory Status²
AMPHIBIANS	
Cascades frog	Fsoc, SSV
Clouded salamander	SSV
Coastal tailed frog	Fsoc, SSV
Foothill yellow-legged frog	SSV
Northern red-legged frog	Fsoc, SSV
Southern torrent salamander	Fsoc, SSV
Western toad	SSV
REPTILES	
Northern Pacific pond turtle	Fsoc, SSC
Western Painted turtle	SSC
BIRDS	
American peregrine falcon	SSV
Bald eagle	Fsoc, FPA
Band-tailed pigeon	Fsoc, FPA
Common nighthawk	SSC
Great-blue heron	FPA
Lewis' woodpecker	Fsoc, SSC
Marbled murrelet	FT, SE
Northern goshawk	Fsoc, SSV
Northern spotted owl	FT, ST
Olive-sided flycatcher	Fsoc, SSV
Osprey	FPA
Purple martin	Fsoc, SSC
Western bluebird	SSV
Willow flycatcher	Fsoc, SSV
MAMMALS	
California myotis	SSV

Fringed myotis	Fsoc, SSV
Hoary Bat	Fsoc, SSV
Long-legged myotis	Fsoc, SSV
Silver-haired bat	Fsoc, SSV
Townsend's big-eared bat	Fsoc, SSC
Pacific fisher	Fsoc, SSC
Pacific marten	FC, SSV
Red tree vole	FC, SSV
Ringtail	SSV

FISH

Coastal Cutthroat, Oregon Coast	Fsoc, SSV
Coastal Cutthroat, Willamette (Upper Willamette)	Fsoc, SSV
Coho, Coastal	FT, SSV
Lamprey, Western Brook	Fsoc, SSV
Lamprey, Pacific	Fsoc, SSV
Lamprey, River	Fsoc

¹Strategy Species are those identified in The Oregon Conservation Strategy (ODFW, 2016).
<http://www.oregonconservationstrategy.org/>

²**Regulatory Status:**

- Fsoc – Federal Species of Concern
- FPA – Forest Practices Act
- FT – Federal Threatened
- FE – Federal Endangered
- SE – State Endangered
- SSC – State Sensitive Critical
- SSV – State Sensitive Vulnerable
- FC – Federal Candidate (Distinct Population Segment Only)

Forest Structure

The foundation of the current FMP is to create a diverse set of forest conditions over time and across the landscape. These forest conditions are described as stand structure types described below.

- **Regeneration (REG):** This stand type occurs when a disturbance such as timber harvest, fire, or wind has killed or removed most or all of the larger trees, or when brush fields are cleared for planting.
- **Closed Single Canopy (CSC):** This stand type occurs when new trees, shrubs, and herbs no longer appear in the stand, and some existing ones begin to die from shading and competition, in a process called stem exclusion.

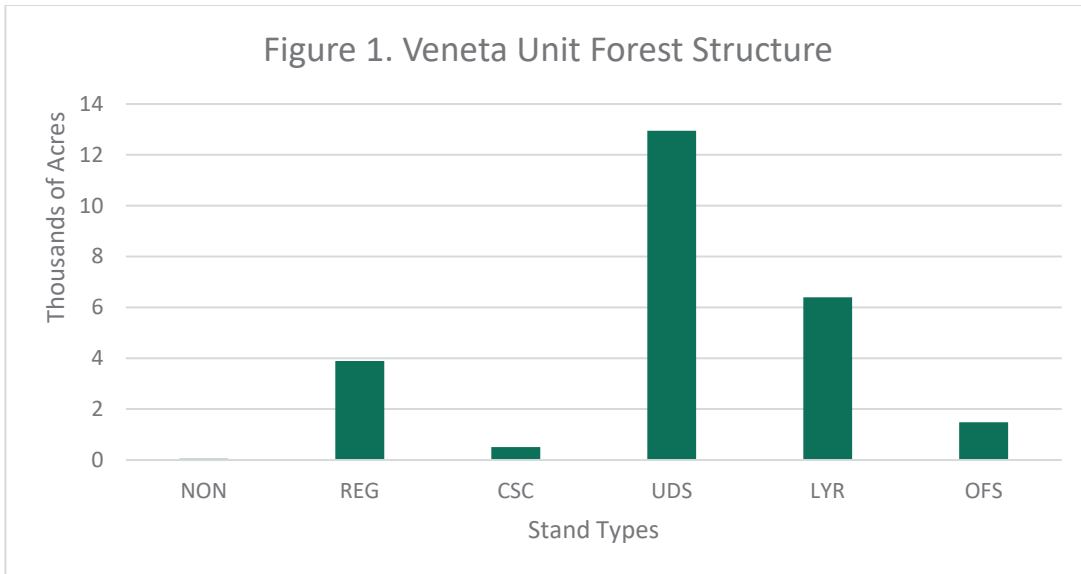
- Understory Development (UDS): This stand type occurs after the stem exclusion process has created small openings in the canopy, when enough light and nutrients become available to allow herbs, shrubs, and new trees to grow again in the understory.
- Layered (LYR): This stand type occurs as the process of understory reinstatement progresses where openings in the canopy persists. Shrub and herb communities are more diverse and vigorous, and two or more distinct layers of tree canopy appear.
- Older Forest Condition (OFS): This stand type occurs when a forest stand attains structural characteristics such as numerous large trees, multi-layered canopy, substantial number of large, down logs, and large snags.

Current Forest Structure

The current stand condition is displayed in the graphs that follow, and on a map in the Map Section. Figure 1 shows the current stand structure and acreage using the structure-based management definitions for structure types. In order to determine the current condition of the stand structure array within the unit, Stand Level Inventory (SLI) was used to identify stand characteristics such as diameter, heights, trees per acre, density, snags, down wood, and understory vegetation to determine stand structures.

Currently, 62 percent of the acres in the Veneta Unit have been inventoried. Information for unmeasured stands is generated by imputation. Imputation uses specific information from a single measured stand to represent similar unmeasured stands.

All silvicultural prescriptions will be based on actual field reconnaissance during pre-operational analysis and planning, in conjunction with SLI data.



Figures 1 & 2. Based on 2021 SLI data.

Note: Non-forest lands (NON) are those areas, greater than 5 acres that are maintained in a permanently non forest condition. The only lands in the unit currently in this classification are large power line right-of-ways.

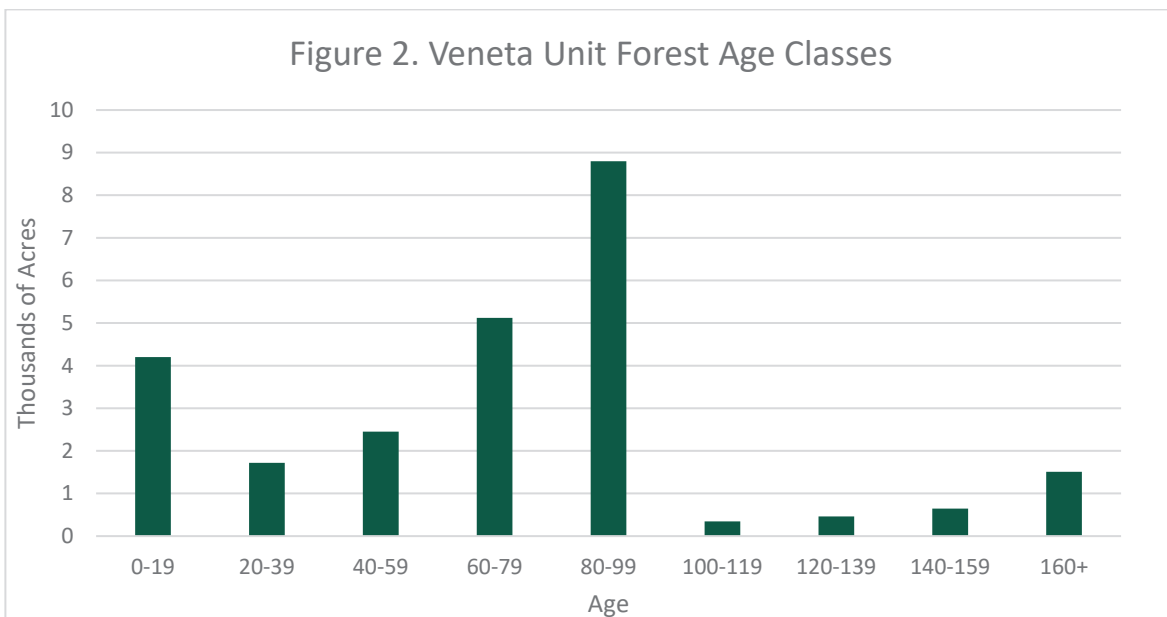


Table 4. Acres and Current Stand Condition

	ACRES	NON	REG	CSC	UDS	LYR	OFS
Veneta Unit Total	25,256	43	3,889	507	12,943	6,392	1,482

Landscape Design Overview

The FMP establishes targets for how much of the forest landscape will be managed to create each of the five structure classes. Expressed as percentage of the landscape, the targets describe a long-range desired future condition (DFC), with upper and lower limits (Table 5).

Table 5. Desired Future Condition (Targets) for the proportion of Stand Structure types across the landscape on each district

Stand Type	Range
REG	15-25%
CSC	5-15%
UDS	30-40%
LYR	15-25%
OFS	15-25%

Together, the LYR and OFS are considered complex stand structures and are designated in a functional arrangement across the landscape resulting in a “mapped landscape design” or DFC Complex. A desired future condition map is in the Map Section. While DFC Complex is mapped, targets for REG, CSC and UDS stands are not mapped, but rather are expressed as a desired range that accounts for changes across the landscape from management during the duration of the IP.

The landscape design process was a collaborative effort between the unit, resource specialists, and ODFW biologists. The district intends to achieve the desired future condition of 37 percent complex stands on the unit by designating areas for older forest structure (OFS) and layered (LYR) stand structures across the landscape, ensuring a variety of forest patch sizes and dispersal habitat for wildlife. It is important to note that the mapped DFC Complex does not represent the current amount of complex forest structure on the landscape. It represents the long-term target and location that will be achieved through active management which is estimated to take 30-40 years to achieve.

The broader landscape design considerations applied consisted of the following:

- The distribution of habitats for native wildlife;
- The range of habitat patch sizes provided;

- Provision of interior habitat areas for species of concern;
- Unique, rare, or sensitive habitats and associated species;
- Connectivity across the landscape including habitats on adjacent federal lands;
- Operational feasibility of active management;
- Current stand age and structure.

The contribution that each selected stand provided to the overall distribution of habitats, and to patch sizes, interior habitat, and connectivity was considered, as well as known or suspected potential to harbor SOCs. Identification and protection of key habitat areas (occupied, suitable, or important for larger landscape connectivity) for SOCs will help maintain existing populations and allow for colonization of new habitat as it develops over the longer term. This landscape design is a foundational strategy for species of concern.

In addition to the development of complex structure, corridors of the more complex stand structure types will be provided along streams. These corridors can provide some connectivity between the complex stands within basins, especially when combined with adjacent federal land.

In the long term these forests are expected to maintain the same general balance of structures over the landscape through time.

Table 6. Mapped DFC Complex (Targets)

	Total Acres	LYR	OFS
Unit Total	25,256	18%	19%

The landscape design map represents the current vision of where complex structures will be developed over time under the current FMP and can be seen in the Desired Future Condition Map in the map section. The district will use this map in the planning of harvest operations and the designing of silvicultural prescriptions. Through the course of implementation, however, refinements to the landscape design map are likely to occur due to stand conditions, harvest efficiency and operability concerns, or new information.

Changes to the landscape design will be fully described in an Annual Operations Plan. The landscape design map will be fully reviewed with any major revision of the unit IP.

Forest Land Management Classification System

The Forest Land Management Classification System (FLMCS). FLMCS is a method of describing the management emphasis of parcels of state forest land

and has been implemented in accordance with OAR 629-035-0055. The management emphasis identifies the extent to which a parcel of land can be managed for a variety of forest resources. It also identifies when a particular forest resource may need a more focused approach in its management, or possibly an exclusive priority in its management. Below are tables summarizing the unit's FLMCS.

The framework of the FLMCS places all state forest land within one of four land management classifications. The classifications are: (1) General Stewardship, (2) Focused Stewardship, (3) Special Use Areas, (4) High Value Conservation Areas. Subclasses are assigned for the specific forest resources that require a Focused Stewardship, Special Use Classification, or High Value Conservation Area Classification.

The definition of land management classifications as defined by OAR are:

On General Stewardship lands, all forest resources are actively managed using integrated management strategies, techniques, and practices to meet forest management planning goals. Strategies, techniques, and practices that are used may vary spatially and temporally.

On Focused Stewardship lands, integrated management practices are performed in a manner that is intended to accomplish forest management planning goals, and are compatible over time and across the landscape when actively managed, but for which a forest management plan, habitat conservation plan, or other legal requirement identifies a requirement for one or more of the following for a specific resource: supplemental planning, before conducting management practices, that helps to achieve identified goals for the specific resource; modified management practices that help achieve the identified goals for the specific resource; or, compliance with legal or contractual requirements above those required on lands classified as General Stewardship.

On lands classified as Special Use, a forest management plan, SHA, or other legal requirement identifies one or more of the following: a legal or contractual constraint dominates the management of the lands and precludes the integrated management of all forest resources; lands are committed to a specific use and management activities are limited to those that are compatible with the specific use.

On lands classified as High Value Conservation Areas, a forest management plan, habitat conservation plan, or other legal requirement identifies areas in the landscape that need to be appropriately managed in order to maintain, enhance, or restore important conservation values and one or more of the following: a legal or contractual constraint dominates the management of the lands and directs the management of forest resources; lands are committed to a specific conservation value and management activities are limited to those that are compatible with achieving goals for the specific conservation value.

Tables 7 and 8 below show the unit’s land management classification. Table 7 shows the classified acres in each of the four management classes. Table 8 shows the number of subclass acres located in the Focused Stewardship Areas, Special Use Areas, and High Value Conservations Areas.

FLMCS

Tables 7 & 8 reflect the current FLMCS for the Veneta Unit.

Table 7. Veneta Unit Acres, by Stewardship Class and Fund*

Classification	BOF	CSL	Total Acres
Focused Stewardship	44,765	252	45,017
Special Use	2,460	40	2,500
High Value Conservation Area	3,385	31	3,416
General Stewardship	6,831	701	7,532

Table 8. Forest Land Management Classifications for the Veneta Unit - Focused and Special Subclasses (Acres)

	Focused Stewardship	Special Use	High Value Conservation Area
Administrative Sites	0	4	0
Agriculture, Grazing	0	0	0
Aquatic & Riparian	4,955	0	1,317
Cultural Resource	0	0	0
Deeds	0	0	0
Domestic Water Use	4	0	0
Easements	0	0	0
Energy & Minerals	0	1	0
Operationally Limited	0	2,440	0
Plants	8	0	0
Recreation	0	0	0
Research/Monitoring	18,370	0	0
Transmission	0	54	0
Unique, Threatened or Endangered Plants	0	0	0
Visual	107	76	0
Wildlife Habitat	21,497	0	2,099

* Acres in Table 7 and Table 8 include overlapping classifications.

Integrated Forest Management Activities

The forest in the Veneta Unit is actively managed to provide a mixture of environmental, economic, and social benefits. The following sections describe the general forest operations, activities and projects that will provide a balance of these benefits as required by Oregon Administrative Rule (OAR 629-035-0020) and will honor the current planning process and commitments made to the HCP during this transition period.

Timber Harvest Operations

Management Activities

Different types of management activities will be used to implement the FMP and HCP strategies. Multiple factors apply to selecting stands for management and prescribing silvicultural prescriptions and their relative importance may change from year to year. Additional factors that affect these annual decisions include the overall objectives identified in this IP, the Annual Harvest Objective (AHO), recent harvest activity in the area, results of threatened and endangered species surveys, condition of the transportation system, current market conditions, division revenue forecasts.

Described below are the different types of management tools that will be used during this IP as needed and where appropriate. The specific operations and management activities necessary to carry out this IP will be described in the Annual Operations Plans starting in FY24.

Partial Cut Harvests (Thinning)

Past management experience found that when timed correctly most stands respond well to thinning. Partial cutting improves forest health by increasing stand vigor and lowering susceptibility to damage from insects, disease, and windthrow, capture natural competition mortality, etc. Partial cutting also produces timber, yields revenue, and enhances scenic and wildlife resources.

Partial cuts in areas not planned to be developed into complex forest conditions will have a silvicultural thinning prescription that reduces stocking enough to increase or maintain individual tree growth. Trees are left evenly spaced over the stand. The goal is to produce high quality, high volume stands at final harvest.

In areas planned to be developed into complex forests, thinning prescriptions will be utilized that are intended to increase or maintain individual tree growth and promote complex forest conditions. Reducing the stocking will encourage larger canopies, diameters, and limbs on the residual trees. In addition, more sunlight will reach the forest floor, which will enhance understory development. The goal

here is to put the stands on a pathway towards a complex structure as opposed to producing high value stands for final harvest.

Regeneration Harvests (Modified Clearcuts and Retention Cuts)

Regeneration harvest removes most trees, but leaves a specified numbers of green trees, snags, and down wood to provide legacy structure (habitat) in the new stand. These types of harvest will pre-dominantly be focused in stands that are located outside of the mapped landscape design of DFC complex and the draft HCAs.

Some stands that have forest health issues or stands that are dominated by alder trees may be considered for regeneration harvest (modified clearcut or retention cut) inside of the mapped landscape design of DFC complex or draft HCAs. These types of harvest prescriptions will be developed in conjunction with biologists with the goal of creating better quality habitat in the future. In these cases, the result will be a new conifer stand of vigorously growing trees while maintaining many of the structural components of the previous stand. These structural components include remnant trees, live green trees, snags, and down wood.

Overview of Structural Components

The FMP, draft HCP and related strategies, describe retention requirements of key structural components such as snags, green trees, and downed wood. The techniques used to develop snags and down wood will vary according to tree size, age, species, and type of management activity.

In first entry commercial thinnings (generally between ages 25 and 40), no prescriptions will be used to develop snags and down wood, as trees this size do not make long-lasting snags or down wood. Some of the trees left in the thinning will naturally become snags, due to top breakage. This would also be the case in younger stands harvested early because of Swiss needle cast (SNC) infections. In older partial cuts, if pre-harvest stand examinations do not indicate enough snags, then some trees may be topped or girdled during the operation to become snags. Harvest prescriptions may be modified to provide contributions to landscape level goals for down wood.

In clearcuts, to obtain down wood and snags objectives pre-harvest estimates and harvest prescriptions must be used to assure these levels are attained. If snags or down wood are found to be deficient in an area, additional leave trees may be retained with the assumption that due to natural causes a certain percentage of these will become snags and/or down wood. In hardwood stands, it is often difficult to find enough large down wood and snags after the operation. Therefore, these structural elements must often come from conifer trees that are present in the stand.

Planned Annual Harvest Objectives

This section describes the management activities that will be accomplished during

the duration of the Implementation Plan period. All management activities will be designed consistent with FMP strategies and draft HCP objectives.

The AHO identifies the sustainable and predictable production of timber (forest products) from the unit, and the harvest activities for the IP period. The AHO is determined through the Harvest Modeling Analysis described in Appendix A. The analysis establishes the AHO range of 9 -10 MMBF as the sustainable volume that can be produced to meet the goals of the Northwest Oregon State Forest Management Plan and draft HCP as applied through this IP. The top of the range allows for flexibility for sale planning and to incorporate additional harvest within HCAs when the Incidental Take Permit takes effect. The AHO will be implemented through the district's Annual Operations Plan (AOP). The objective is to be within the range of the AHO on an annual basis throughout the length of the IP.

Harvests that occur to meet the AHO range may move some stand types to other stand types during this IP period. Modified clearcut and retention cut harvest would move stands from their current stand condition into the Regeneration stand type while partial cutting may maintain a stand's current stand condition, or could provide improved growing conditions to allow for increased stand diversity over time to move into another more complex stand type. Due to the short duration of this IP, impacts to the amounts of different stand types will be relatively minor and will be described in the Annual Operations Plan.

Under normal circumstances, the volume proposed in an AOP will be within the AHO target range; however, some events may result in an AOP volume that is farther from the AHO target. These events may consist of, but are not limited to, catastrophic windstorm, fire, and/or market conditions. For example, catastrophic events may lead to emergency salvage operations that result in harvesting above the AHO, or market conditions preclude meeting AHO targets. The Annual Operations Plan will describe how the volume relates to the AHO volume identified in the IP.

Young Stand Management

Reforestation

Reforestation promptly follows all regeneration harvests and patch-cut harvests as per the Oregon Forest Practice Rules. ODF plants native tree species that are grown from seed that is considered to be suited to future conditions. This seed is produced from traditional crossbreeding of trees from a variety of seed zones to make them resilient to current disease and future climate conditions. Individual reforestation strategies are developed for harvest units. These strategies take into consideration elevation, aspect, disease, desired future stand conditions, and anticipated drier, hotter future conditions resulting from climate change. These strategies include site preparation, species, stock type and tree spacing tailored to each unit.

A variety of species may be planted during reforestation, with Douglas-fir being the primary species. Western hemlock, red alder, and western redcedar will also be planted if the site is appropriate for those species. In areas where pathogens affecting Douglas-fir are present, resistant species such as red alder or western redcedar may be planted in higher percentages. Tree planting, site preparation, vegetation management, and tree protection activities are important for successful stand establishment. Site-specific prescriptions may include, but are not limited to, slash piling, prescribed burning, herbicide treatments, manual release, and tubing (of seedlings to protect them from animal damage).

Pre-commercial Thinning

Pre-commercial thinning (PCT) is an important density management practice in young, dense stands. PCT generally occurs in stands between 13 and 17 years old and removes non-merchantable small or defective trees, in order to provide more water, light, and nutrients to increase the growth of the healthy residual trees. In addition, PCT delays the canopy from closing, thus preserving the growth of herbaceous vegetation to maintain plant species diversity and forage opportunities for wildlife and to contribute to species diversity through density management tree selection.

Forest Road Management

Overview

Due to the unit's scattered ownership pattern, the primary road network crosses the property of many different landowners. This established road network has been in place for decades and provides access to multiple landowners for forest management activities, fire suppression, and public travel. Visions, guiding principles, and goals for managing the road network are discussed in the *Northwest Oregon State Forests Management Plan* (January 2010) and the *Forest Roads Manual* (September 2006). The latter also provides standards and guidance for all road management activities and definitions, road classifications and other terms.

The existing road system consists of collectors and spurs: in total 95 miles of mostly single-lane roads with turnouts. Many of the main roads (collectors) were originally built in the 1940s and 1950s to standards that are not the same as those identified in the *ODF Forest Roads Manual* (September 2006). However, most of these roads have been upgraded or vacated and now meet the more recent standards of improved drainage structures, rock surfacing, width, and alignment.

Fish passable structures have been installed on nearly all streams that have been classified as fish streams. There may be a limited number of streams in the upper reaches of drainage basins that have yet to be classified as fish or non-fish where structures may need to be replaced. There are still a few roads that are a legacy from those earlier decades that need improvement, access restriction or vacating.

The following table shows the approximate number of miles by road classification:

Table 9. Veneta Unit Surfaced Road System

Road Classification	Miles
Mainline	0
Collector	41
Spur	54
Total Miles	95

Not all surfaced roads are suitable for all-weather haul. Surfaced roads not suitable for all-weather haul will be improved as needed for timber sale access.

Hydrological connectivity surveys are performed on haul routes during sale layout. The district prioritizes road improvement projects that reduce hydrologic connectivity and culvert replacements that are barriers to fish migration on active or planned haul routes and sites of opportunity near active or planned haul routes. Road maintenance investments are made to support forest operations, protect existing road infrastructure and water quality, and provide for safety improvements. The district also closely monitors road conditions on active operations and performs additional patrols and assessments during and after inclement weather events.

Potential Road Activities

Roads will be constructed and maintained as necessary to protect water quality and the road system asset value. Road maintenance activities will follow the maintenance guidance in Chapter 7 of the *ODF Forest Roads Manual* and the Oregon Forest Practices rules. Road maintenance, like road construction and improvement, is primarily accomplished under timber sale contracts or through work order contracts.

Road construction and improvement will be primarily achieved through project work connected with timber sales or through work order contracts. The majority of roads to be constructed will be single lane spur roads that are within or access timber sale areas. Collector roads may be built to connect these sale areas to the mainline system, and in most cases, will access other future timber sales. Many of these same roads will be used for numerous management activities over the next several decades.

Recreation, Education, and Interpretation (REI) Management

Recreation on state forest lands in the unit is limited due to the scattered ownership pattern and lack of access across private forestlands. However, approximately 60 percent of the unit acres are permanently open to public access and dispersed recreation. Recreational use on the unit includes occasional hunting, some backroad driving, dispersed camping, and firewood cutting. Very little state land is adjacent to fishable streams and there are no designated hiking trails or campgrounds on the unit. Recreational use of state forests on the unit is not anticipated to increase to any appreciable extent. This is mostly due to the fragmented ownership pattern, accessibility, lack of suitable sites, and size of the parcels managed by the district. No recreation development is anticipated during this IP period.

Other Integrated Forest Management Activities

Aquatic & Riparian Management

An objective of State Forests' aquatic resources management is to maintain, enhance, and restore aquatic habitat. Strategies are employed during harvest activities and include but are not limited to: leave trees adjacent to streams to protect stream temperature, provide nutrients, protect stream banks, and eventually provide wood to improve fish habitat. This is achieved primarily through riparian buffer strategies specific to the aquatic resource characteristics such as presence or absence of fish, stream size, and duration of stream flow.

Stream Enhancement Projects

State Forests has been committed to implementing stream enhancement work on ODF-managed lands for more than two decades as a partner in the *Oregon Plan for Salmon and Watersheds* and in partnership with ODFW, local partners, and adjacent land managers. Stream enhancement, fish passage, and ODF's 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-dependent species.

The overarching approach to habitat restoration is described in the Forest Management Plan and is summarized below:

- Eliminate human-induced conditions on the forest that may contribute to aquatic habitat deficiencies, or that may limit the timely recovery of desired aquatic habitat conditions.

- Promote aquatic habitat conditions that will support the short-term survival needs of depressed salmonids, in order to reduce the potential for further declines in these populations.
- Attain properly functioning aquatic habitat conditions in a timely manner.
- Encourage forest conditions that will support the ecological processes necessary to naturally create and maintain complex aquatic habitats on a self-sustaining basis.

When preparing the Annual Operation Plans (AOP) the district and the staff Aquatic and Riparian specialist will work together to assess stream enhancement opportunities. Where feasible, the district intends to combine large wood placements and other stream enhancement projects in high priority stream reaches with the timing of an adjacent or nearby timber sale in order to recognize the benefits of onsite equipment, operators, and available trees. Additionally, and when available, specialists work with ODFW and/or watershed councils, access other local prioritization information such as Coho Strategic Action Plans, Rapid Bio-assessments, Watershed Assessments, etc. to inform where to focus efforts.

Model and GIS data will be utilized to develop a first screening and initial prioritization of potential projects for each AOP. Once this initial list has been developed there are still several remaining factors to consider, including but not limited to: stream access, species and size of trees within harvest units, harvest mechanisms (i.e., ground or cable), and stream specific characteristics such as current wood loading amounts, valley configuration, gradient, stream size and power, nearby infrastructure, land ownership upstream/downstream, domestic water sources, etc. This work will be conducted during the AOP process or during sale layout depending on workloads and efficiency.

Land Exchanges and Easements

In order to maintain or improve access to land parcels and potentially consolidate lands the district will continue to pursue land exchange and easement opportunities that are consistent with current Board of Forestry policy to achieve greatest permanent value.

Property Lines and Corners

The establishment and maintenance of property corners and lines will be prioritized and scheduled through the AOP. Survey work may be accomplished through multiple methods including service contracts with licensed professional land surveyors, cost sharing with adjacent landowners or utilizing the licensed surveyor on staff with ODF.

Special Forest Products

The district has very little to no demand from the public for minor forest products such as salal, ferns, mushrooms, moss, boughs, etc within the unit. This is due to low population centers near the lands within the unit, scattered ownership patterns and limited access due to gated private roads.

There is a low to moderate demand for firewood within the unit. The district has offered both personal and commercial firewood cutting permits in the past. It is anticipated that firewood demand will remain the same during this IP period. Firewood opportunities within the unit will be evaluated each year and the firewood cutting program will be included in each AOP.

Cultural, Archeological, and Historical Resources

It is the policy of the Oregon Department of Forestry, State Forests Division, to preserve and protect archaeological and cultural resources and sites during forest management activities according to state law. In order to protect any potential cultural resources during forest management activities, planned operations areas are screened for the presence of cultural resources. Areas where cultural resources may be present receive further review and avoidance measures where appropriate. Consultation with the State Historic Preservation Office or a qualified archaeologist shall occur if any cultural or archaeological resources are inadvertently discovered on State Forest lands during the course of management activities.

Energy and Mineral Resources

Limited amounts of mineral resources (aggregate rock) have been identified in isolated locations in the unit to make improvements to transportation systems needed to support forest management operations. The district will assess the amount of and quality of rock present in these locations. If the assessment data indicates sufficient rock, the district will analyze resource protection issues and estimate long-term rock requirements.

No energy resources have been identified in the unit.

Map Section

Western Lane District – Veneta Unit: Overview

Western Lane District – Veneta Unit: Current Condition Stand Structure

Western Lane District – Veneta Unit: Desired Future Condition

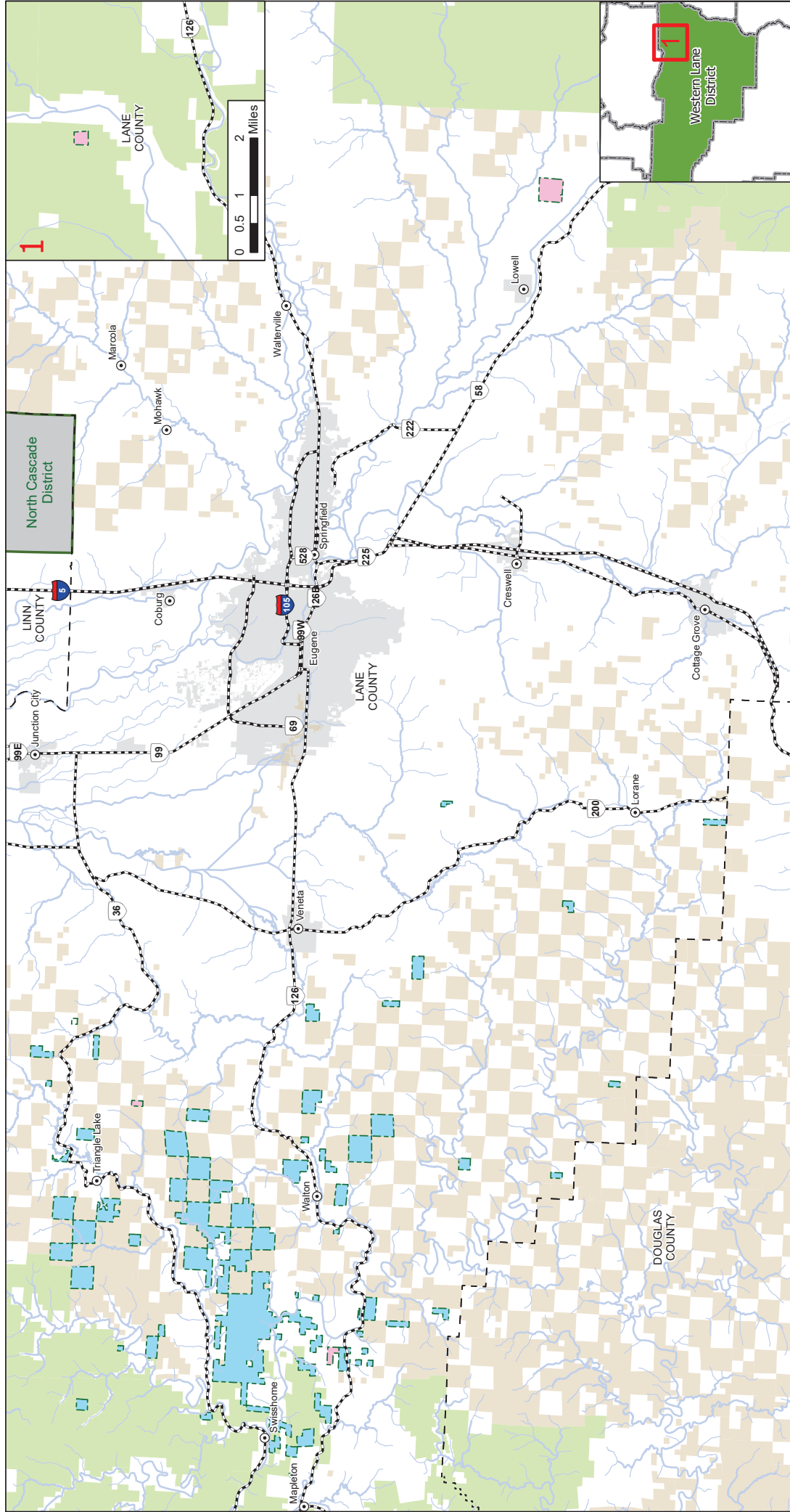
Western Lane District – Veneta Unit: Forest Land Management Classification –
Stewardship Classes

Western Lane District – Veneta Unit: Forest Land Management Classification –
Biological Subclasses

Western Lane District – Veneta Unit: Forest Land Management Classification –
Management Subclasses

Western Lane District – Veneta Unit: Forest Land Management Classification –
Social Subclasses

Western Lane District - Veneta Unit Overview



Ownership

- Board of Forestry Lands
- Common School Lands
- United States Bureau of Land Management
- United States Forest Service

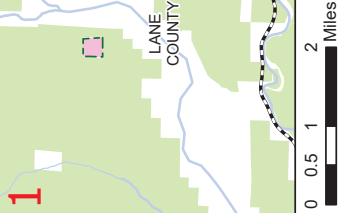
- Streams, Large
- Streams, Medium
- Management Basins
- Adjacent Districts

- Counties
- City Limits
- Roads
- Towns

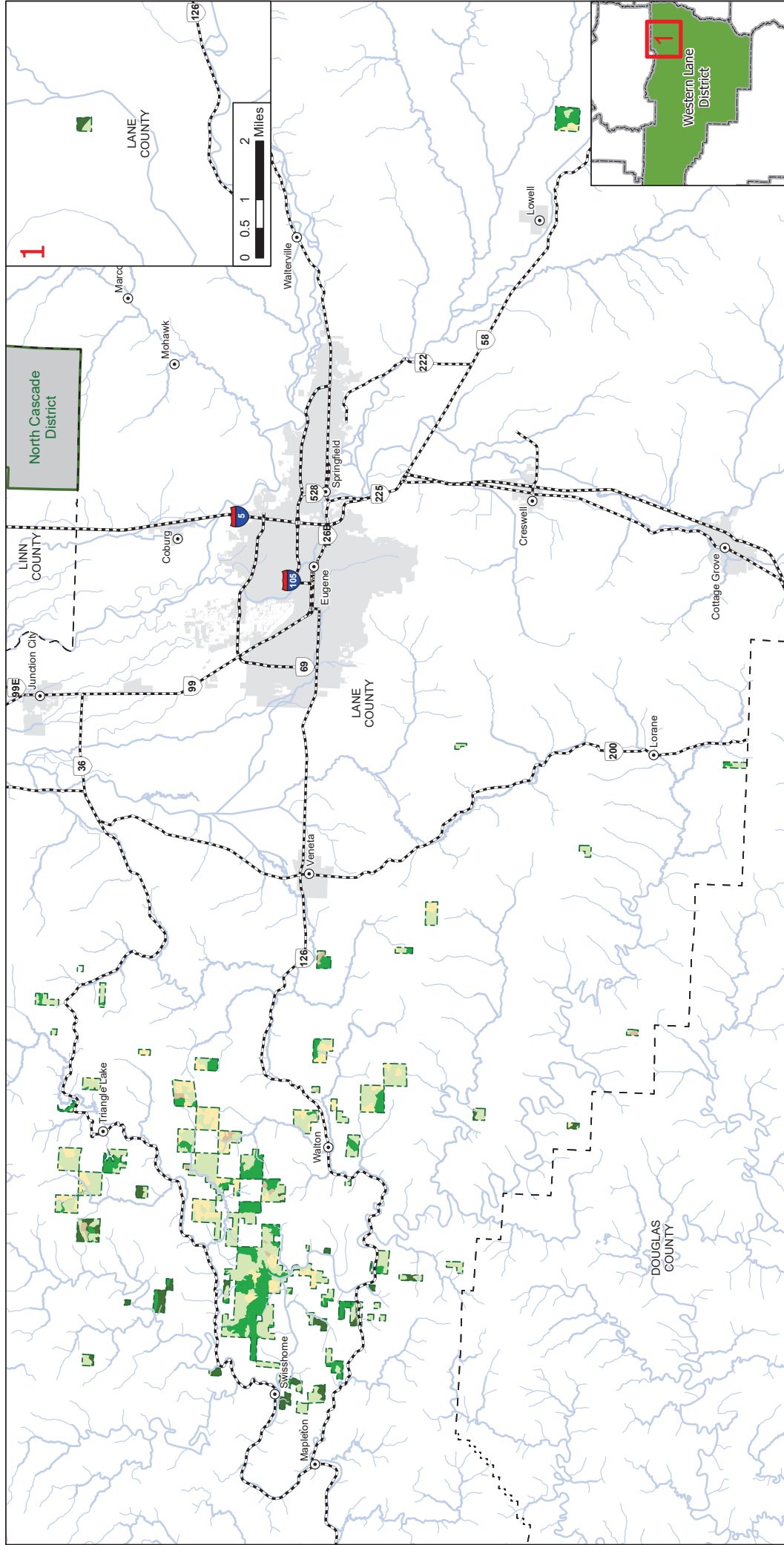
0 2 4 6 8 Miles



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Western Lane District - Veneta Unit Current Condition Stand Structure



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Legend:

- Counties
- City Limits
- Roads
- Towns

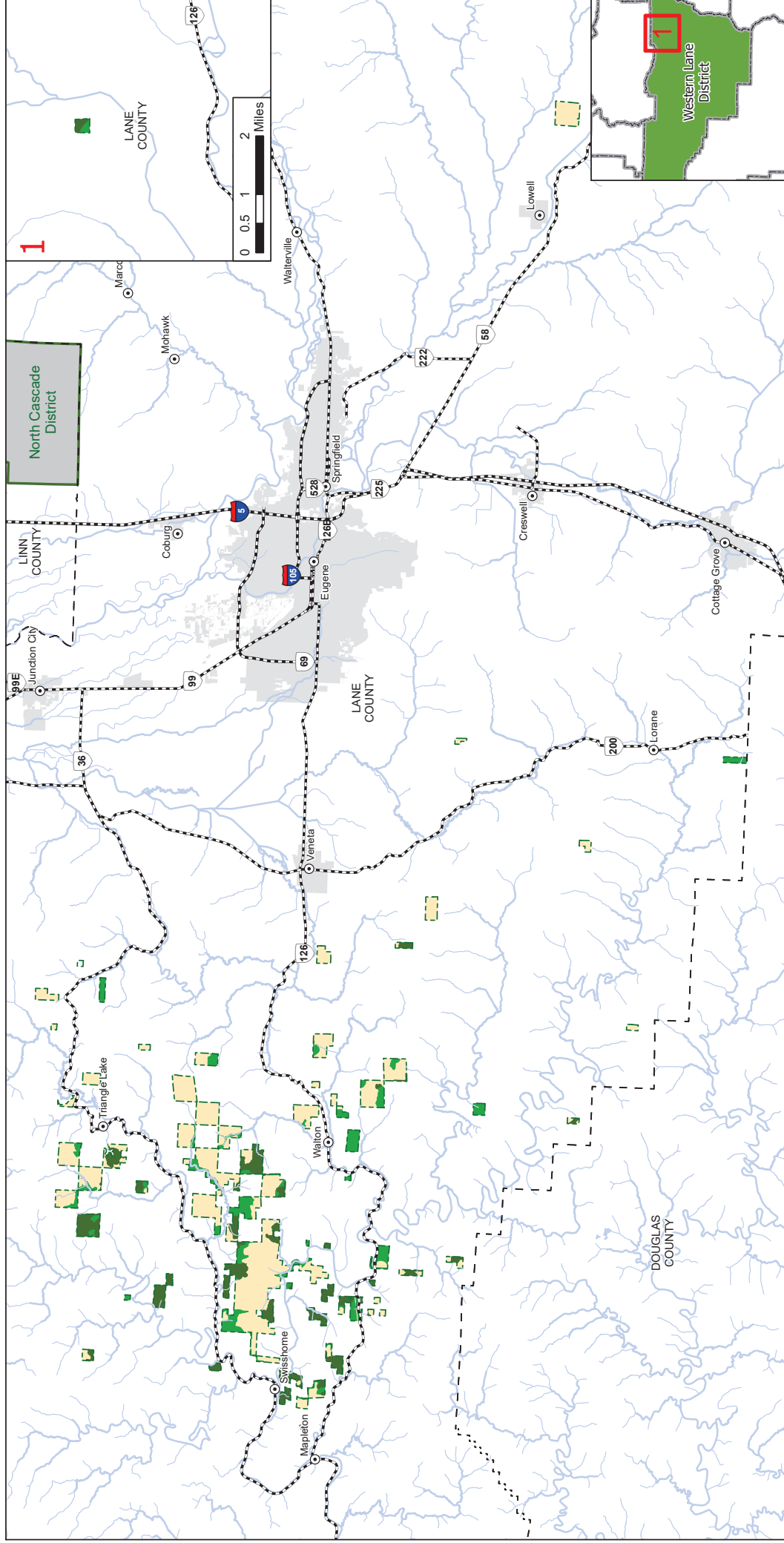
Legend:

- Streams, Large
- Streams, Medium
- Management Basins
- Adjacent Districts

Legend:

- Non-Structurally Capable
- Regeneration
- Closed Single Canopy
- Understorey
- Layered
- Older Forest Structure

Western Lane District - Veneta Unit Desired Future Condition



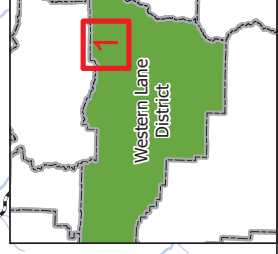
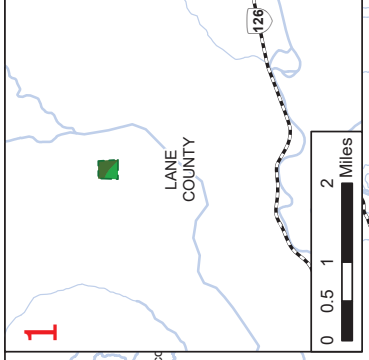
Stand Structure Type

- Layered
- Older Forest Structure
- General

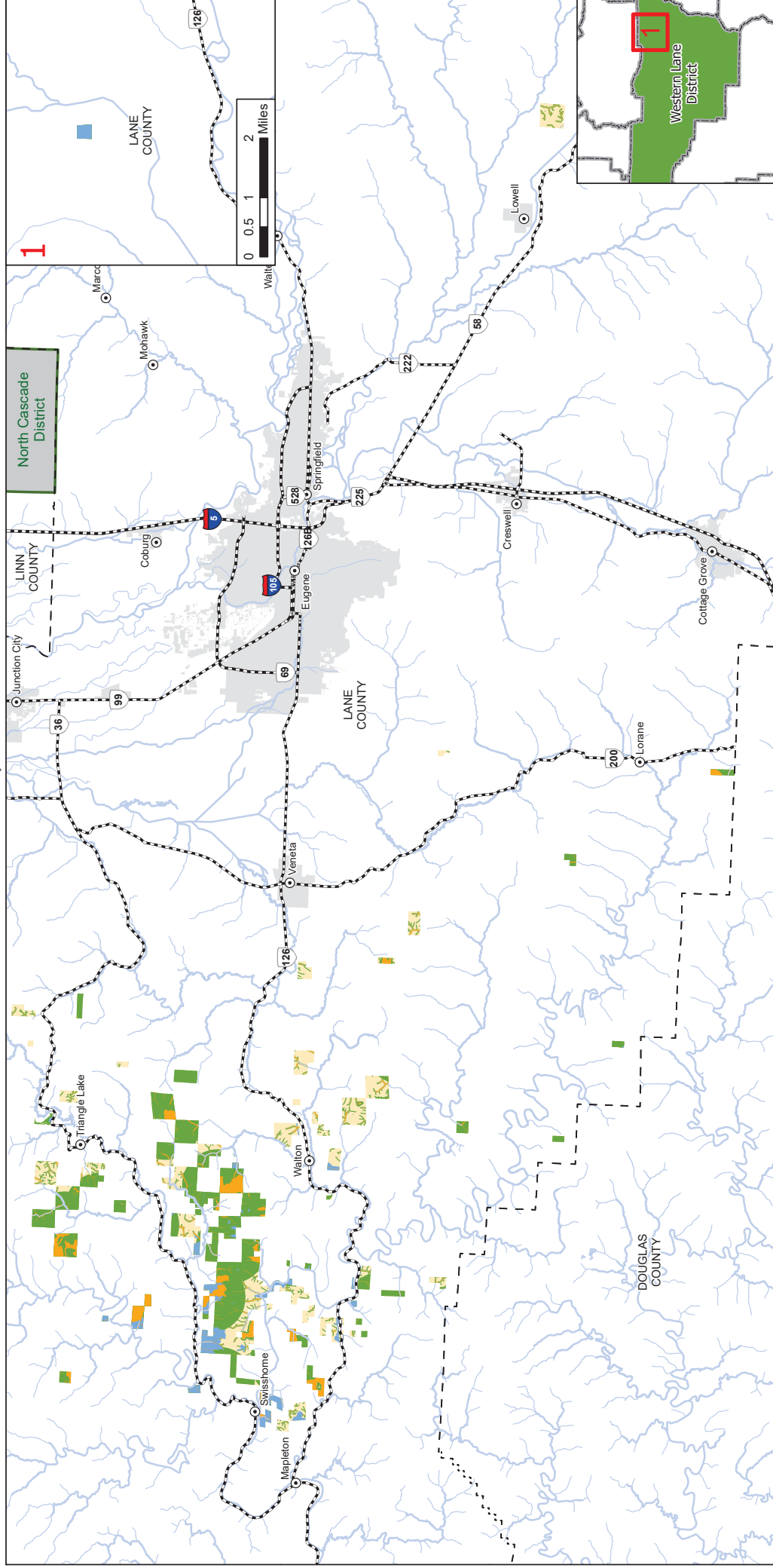
- Streams, Large
- Streams, Medium
- Management Basins
- Adjacent Districts
- Counties
- City Limits
- Roads
- Towns



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Western Lane District - Veneta Unit Forest Land Management Classification Stewardship Classes



Stewardship

- High Value Conservation Area
- Special Use
- Focused Stewardship
- Streams, Large
- Streams, Medium
- ODF Managed Lands
- Adjacent Districts

Legend

- Counties
- Towns
- Roads
- City Limits

Scale

0 2 4 6 8 Miles

North Arrow

Inset Map

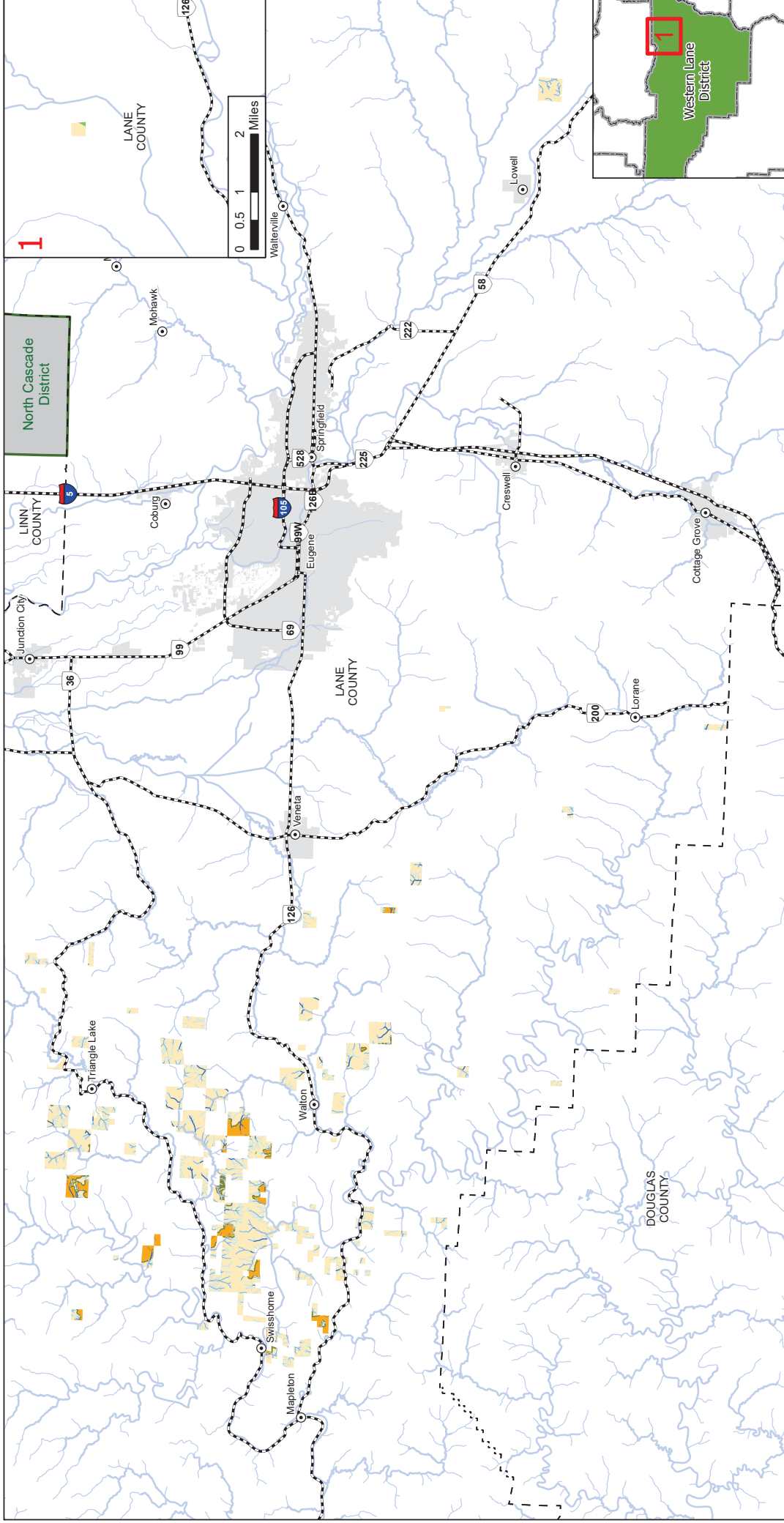
Western Lane District

Disclaimer

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OREGON DEPARTMENT OF FORESTRY

Western Lane District - Veneta Unit Forest Land Management Classification Biological Subclasses



Legend

HVCA Subclasses

- Aquatic and Riparian Habitat
- Wildlife Habitat

Focused Subclasses

- Aquatic and Riparian Habitat
- Plants
- Wildlife Habitat

Other Features

- Streams, Large
- Streams, Medium
- ODF Managed Lands
- Adjacent Districts
- Counties
- Roads
- Towns

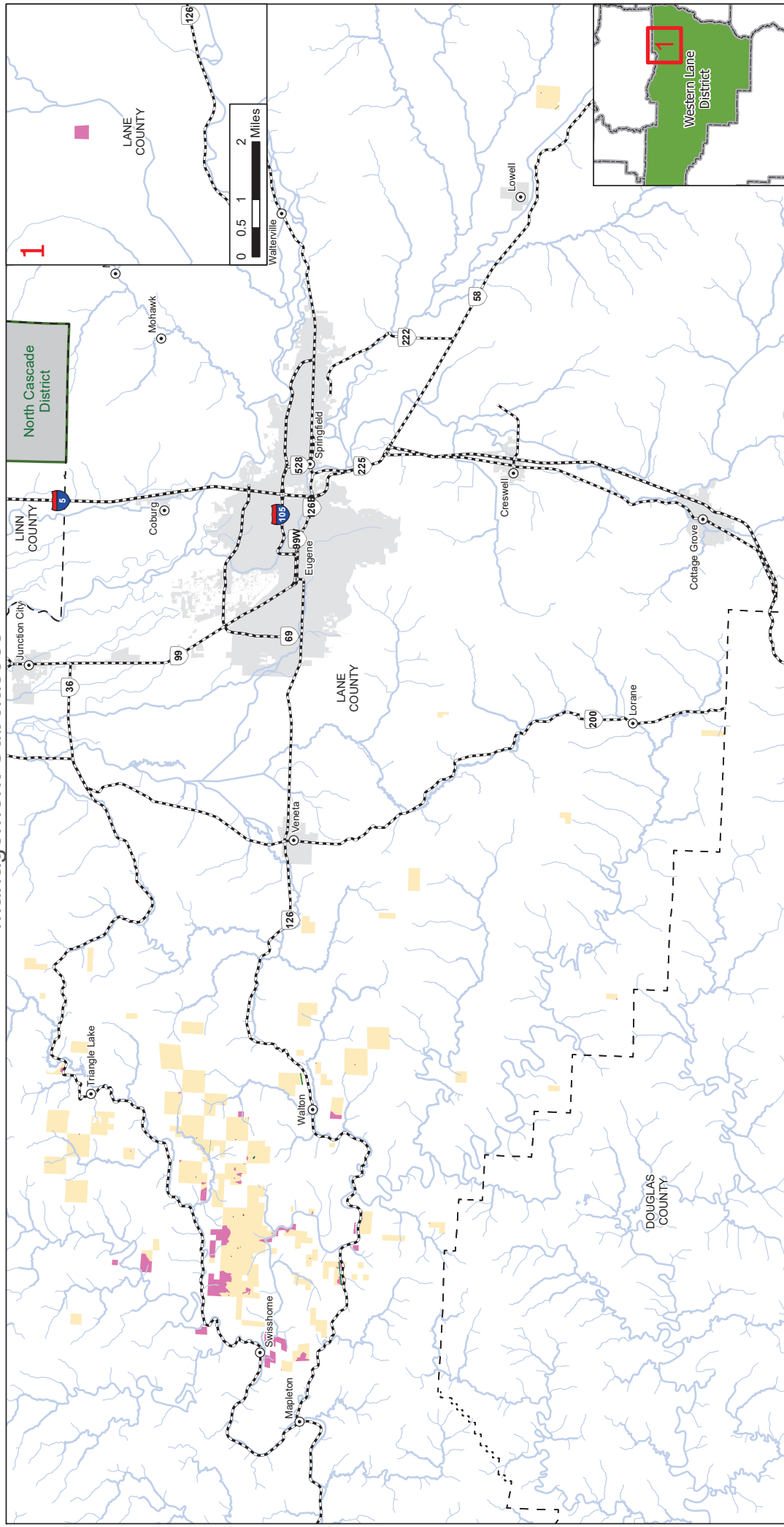
Scale: 0 2 4 6 8 Miles

North Arrow

Inset Map: Shows the location of the Western Lane District within the larger context of the Oregon Department of Forestry's districts.

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Western Lane District - Veneta Unit Stewardship Classifications Management Subclasses



Special Subclasses

- Administrative Sites
- Energy and Minerals
- Transmission
- Operationally Limited

Focused Subclasses

- Focused Research/Monitoring
- Streams, Large
- Streams, Medium
- ODF Managed Lands

Adjacent Districts

- North Cascade District
- Western Lane District

Legend

- Counties
- City Limits
- Roads
- Towns

Scale

0 2 4 6 8 Miles

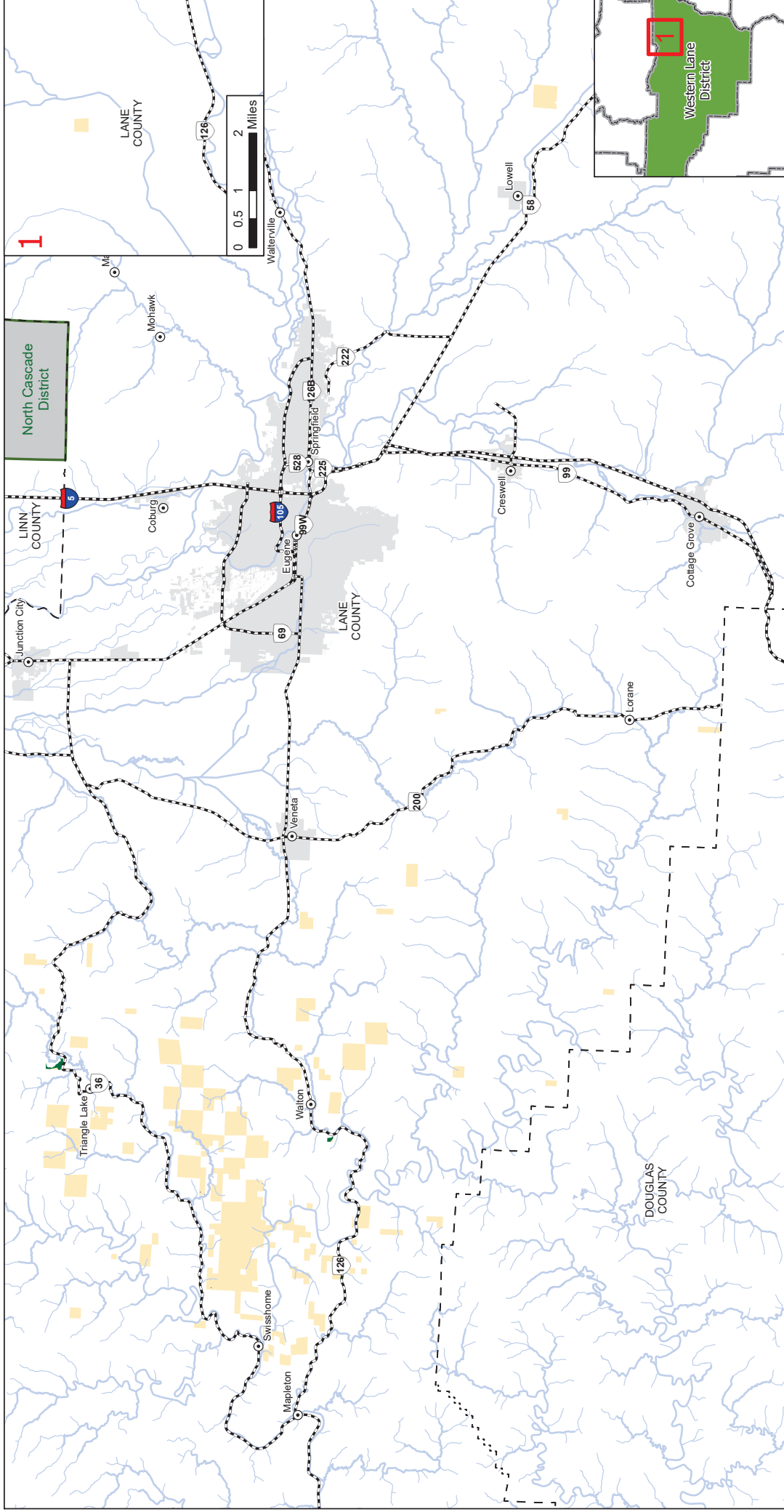
Scale

0 0.5 1 2 Miles

North

Disclaimer: This product is for informational use and may not have been reviewed for engineering, or surveying purposes. This information or understanding that conclusions drawn from such are the

Western Lane District - Veneta Unit Forest Land Management Classification Social Subclasses



Legend

- Streams - Large
- Streams - Medium
- Streams - Small
- Domestic Water Use
- Visual
- Counties
- Adjacent Districts
- ODF Managed Lands
- Roads
- Towns
- City Limits

Scale

0 2 4 6 8 Miles

North Arrow

Inset Map

Western Lane District

Disclaimer

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Logo

OREGON DEPARTMENT OF FORESTRY

Appendix A

Harvest Modeling Analysis

This appendix describes the *Harvest Modeling Analysis* the district used to determine the Annual Harvest Objective (AHO) to achieve the strategies described in this Implementation Plan, the Northwest Oregon State Forest Management Plan, the draft HCP requirements, the Species of Concern strategies, and the other plans, policies or strategies listed in this Implementation Plan.

The analysis is based on the volume, stand structure and wildlife habitat outputs produced utilizing a harvest scheduling model called Patchworks. These outputs were then reviewed and adjusted as necessary using expert opinion from the district. This model uses spatial inputs and a set of rules to find a solution that optimizes multiple goals across a 150 year timeframe. There are three primary inputs to the harvest model: (1) a growth-and-yield model, in this case the Forest Vegetation Simulator (FVS), (2) a detailed spatial representation of the landscape, using thousands of polygons in GIS, and (3) a set of rules and weighted goals.

The primary competing goals in the model are (1) timber harvest in the short- and long-term; (2) landscape design in the short-term and complex structure requirement in the long-term and (3) wildlife habitat development in the short- and long-term.

Some of the other rules followed by the model include:

- Ensure sustainability of both long-term timber harvest and inventory on the landscape: Harvest volume is held to even-flow through the entire 150 years and volume of growing stock is not allowed to decline after year 100. Even-flow means that the harvest volume is not allowed to decrease or increase, but must remain the same during the 150 year timeframe.
- No regen harvest within the mapped landscape design for desired future complex stands for the first five years, then the landscape design is allowed to move around the landscape.
- No regen harvest in Terrestrial Anchor Sites for the first five years.
- Regen harvest is allowed with the HCAs to treat Swiss needle cast and alder stands for wildlife habitat improvement as allowed by the HCP for the first 30 years.
- Thinning of healthy conifer stands within the HCAs for the first 30 years to improve wildlife habitat as allowed by the HCP.
- A minimum of 40% estimated spotted owl dispersal habitat was maintained outside of HCAs as required by the HCP.
- Patches of regeneration harvest were not allowed to exceed 120 acres in a single five year model period.

The model solution suggests a volume output where the long-term integrity of both the Desired Future Condition and the HCP implementation requirements remain intact at the end of the IP timeframe (2-3 years). The IP volumes need to accommodate several scenarios during this transition period as ODF works towards getting an approved HCP and developing a new Western Oregon FMP. Those scenarios include:

- Current FMPs with species of concern protections, take avoidance strategies and T&E surveys while implementing the HCP (period 1 only);
- Current FMPs while implementing the HCP requirements with an incidental take permit (after period 1);
- Allow for the planning process needed to determine where up to 1,500 acres per year of thinning of healthy conifer stands within the HCAs will occur across the HCP Permit Area.

Table 1. Modeled Harvest Volume Per Year

Total Harvest Volume (MMBF)
9.8

Harvest models are limited by the model’s inputs, and uncertainty in the inputs should be noted. Initial stand measurements are taken from a stand inventory that inherently has uncertainty for inventory, stand age, etc. From that initial inventory, stands are projected using the FVS growth model, which introduces additional uncertainty pertaining to current and future forest conditions. Spatial information is based on current GIS layers where uncertainty occurs from using modeled streams and roads layers, and predicted steep slope and inner gorge areas.

The model solution was reviewed by the district to ensure that model rules were being followed across the landscape and that the solution is implementable. The district also reviewed a sub-set of harvest units within the first ten years of the model to evaluate age at harvest, harvest volume, inventory growth rates, and if model rules were being followed at the operational level. The model solution review also looked at impacts to recreation, wildlife, district workload and finances.

There were issues identified within the Model solution:

- Volume per acre was too high
- Thinning ranges inside/outside HCAs were not working correctly within the model
- Stream data shows some inconsistencies

To account for the over optimistic harvest volume per acre, a volume reduction (determined by the district using cut out data during district Model Solution Review (MSR)) was applied to the total volume from the model output as shown below.

Table 2. Adjusted Volume Per Year

Unadjusted Total Volume	Unit Volume reduction based on MSR		Adjusted Total Volume
	Regen	Thin	
9.8	5%	28%	9.2

This becomes the base amount of harvest volume per year that may be realized during this IP duration. To allow flexibility for sale planning and to incorporate additional harvest within HCAs when the Incidental Take Permit takes effect, volume targets for the IP duration are being expressed as a range presented below.

Table 3. Unit Harvest Volume Per Year

Volume Range (MMBF)
9 - 10

Appendix B

SOC Limiting Factors Coarse Evaluation and Additional Strategies.

Common Name	Limiting Factors (LF)*	FMP Strategies that Protect or Maintains LF or Habitat	Additional SOC Strategies to address LF
Cascades frog	Montane species vulnerable to genetic isolation. Experiencing substantial reductions in southern parts of range (e.g., CA). Sensitive to waterborne pathogens.	Aquatic and Riparian Management Strategies	None at this time
Clouded salamander	Limited range (occurs primarily in Oregon). Loss of large logs.	Landscape Management Concepts 1-3 and Management Strategies 1-4, particularly LMS 3 (retention of snags and downed wood in harvest units)	None at this time
Coastal tailed frog	Limited range (PNW endemic), Low reproductive rate. Low dispersal ability. Sedimentation & increases in water temperature.	Aquatic and Riparian Management Strategies	None at this time
Northern red-legged frog	Loss of egg-laying habitat. Predation & competition from bullfrogs and invasive fish.	Aquatic and Riparian Management Strategies	None at this time
Southern torrent salamander	Limited dispersal. Sensitive to drying & changes in stream flow.	Aquatic and Riparian Management Strategies	None at this time
Western toad	Loss of breeding habitat, siltation, and recreational impacts.	Protect wetlands, road BMPs reduce siltation	None at this time
Northern Pacific pond turtle	Loss of aquatic & nesting habitats (conversion and invasive species). Road Mortality. Predation.	Aquatic and Riparian Management Strategies	Site Plans for riparian areas at known sites
Western painted turtle	Loss of aquatic & nesting habitats (conversion and invasive species). Predation.	Aquatic and Riparian Management Strategies	Site Plans for riparian areas at known sites
American peregrine falcon	Disturbance at nests.	Landscape Management Concept 2 - Landscape Design (maintain unique habitats and those of species at risk)	Site Plans near active nests
Bald eagle	Loss of large nest trees.	Landscape Management Concepts and Strategies; Aquatic and Riparian Management Strategies	Site Plan/FPA Rules
Band-tailed pigeon	Reduction in quality and number of mineral sites. Large area requirements.	Landscape Management Concepts and Strategies; Aquatic and Riparian Management Strategies	Site Plan/FPA Rules
Common nighthawk	Loss and degradation of nesting habitat due to changes in hydrology and wildfire. Increased predation pressure and reductions in aerial insect abundance.	Landscape Management Concepts and Strategies; Aquatic and Riparian Management Strategies	Site Plans near active nests

Common Name	Limiting Factors (LF)*	FMP Strategies that Protect or Maintains LF or Habitat	Additional SOC Strategies to address LF
Great blue heron	Sensitive to disturbance at nesting rookeries.	Landscape Management Concepts and Strategies; Aquatic and Riparian Management Strategies	Site Plan/FPA Rules
Lewis' woodpecker	Population declines & local extirpation; habitat loss and degradation; loss of old cottonwood snags; competition with starlings for nest cavities.	Landscape Management Concepts 1-3 and Management Strategies 1-4, particularly LMS 3 (retention of snags and downed wood in harvest units).	Modified Practice: Focus or increase snag retention in upland areas in occupied areas; Site Plans
Marbled murrelet	Reductions in late seral forest; low reproductive output & success. Habitat loss due to severe fire.	Landscape Management Concepts and Strategies; Aquatic and Riparian Management Strategies; State Forests Marbled Murrelet Operational Policy (1.1) and associated Procedures and Guidance	None at this time
Northern goshawk	Large area requirements. Affected by reductions in amount of late successional and closed canopy forest.	Landscape Management Concepts and Strategies	Site Plan (already in existing SOC policy for other districts)
Northern spotted owl	Declining. Large home range. Reduction in late seral habitat. Habitat loss to severe fire. Competition from barred owls.	Landscape Management Concepts and Strategies; State Forests Northern Spotted Owl Operational Policy (1.2) and associated Procedures and Guidance	See 2019 Amended Safe Harbor Agreement for Barred Owl Removal.
Olive-sided flycatcher	Relatively large area requirements. Increased predation rates in harvest units or fragmented forest.	Landscape Management Concepts and Strategies	Modified Practice: Structural retention strategies (number and location of green trees and snags) could be modified in known nest stands.
Osprey	Large snags and broken-topped trees in close proximity to water. Sensitive to disturbance at nest sites.	Aquatic and Riparian Management Strategies	Site Plan/FPA Rules
Purple martin	Loss of nesting cavities. Competition with starlings for nest cavities, adequate aerial prey base.	Landscape Management Concepts 1-3 and Management Strategies 1-4, particularly LMS 3 (retention of snags in harvest units)	Modified Practice: Focus on retention of snags with specific characteristics (low, skinny) in upland areas of clearcuts (within 3 miles of large water bodies)
Western bluebird	Habitat loss & degradation. Competition from non-native birds for cavities.	Landscape Management Concepts 1-3 and Management Strategies 1-4, particularly LMS 3 (retention of snags in harvest units)	Modified Practice: Focus on retention of snags with specific characteristics in upland areas of clearcuts
Willow flycatcher	Declining populations, loss of nesting habitat.	Landscape Management Concepts and Strategies; Aquatic and Riparian Management Strategies	Modified Practice: Consider gap creation, heavy thinning, and intentional development of complex early seral habitat
California myotis	Reduction of large snags, patchy distribution, low populations.	Landscape Management Concepts 1-3 and Management Strategies 1-4, particularly LMS 3 (retention of snags in harvest units)	None at this time
Fringed myotis	Disturbance at roosts, patchy distribution, reduction in snags.	Landscape Management Concepts 1-3 and Management Strategies 1-4, particularly LMS 3 (retention of snags in harvest units)	None at this time

Common Name	Limiting Factors (LF)*	FMP Strategies that Protect or Maintains LF or Habitat	Additional SOC Strategies to address LF
Hoary bat	Habitat loss.	Landscape Management Concepts 1-3 and Management Strategies 1-4, particularly LMS 3 (retention of snags in harvest units)	None at this time
Long-legged myotis	Reduction of late seral conifer, loss of hollow trees and tall, newly dead snags, loss of healthy riparian habitat, untimely bridge replacement.	Landscape Management Concepts 1-3 and Management Strategies 1-4, particularly LMS 3 (retention of snags in harvest units); Riparian Management Strategies	None at this time
Pacific fisher	Large home range, low-rate reproduction, specific denning habitat.	Landscape Management Concepts 1-3 and Management Strategies 1-4; Riparian Management Strategies	Follow guidance in 2019 Fisher CCAA
Pacific marten	Low survival in fragmented forests. Road mortality. Predation.	Landscape Management Concepts 1-3 and Management Strategies 1-4; Riparian Management Strategies	None at this time
Red tree vole	Small home range, limited dispersal ability, low reproduction rate.	Landscape Management Concepts and Strategies	None at this time.
Ringtail	Habitat loss & fragmentation.	Landscape Management Concepts 1-3 and Management Strategies 1-4, particularly LMS 3 (retention of snags in harvest units); Riparian Management Strategies	None at this time
Silver-haired bat	Reduction of late seral conifer forests, loss of hollow trees and tall, newly dead snags.	Landscape Management Concepts 1-3 and Management Strategies 1-4, particularly LMS 3 (retention of snags in harvest units)	None at this time
Townsend's big-eared bat	Highly sensitive to disturbance at roosts; highly specific roost requirements (dependent on uncommon or at-risk structures for habitat). Pesticides and related prey reduction.	Cultural resource protection may protect against destruction of some mines/buildings but not against disturbance	Site Plans for any mine or cave roosts or building maternal roosts
Coastal Cutthroat, Oregon Coast	Habitat fragmentation or actions that increase population isolation. Water Quality. Alterations of hydrology and watershed function. Loss of estuarine habitat for rearing. Ocean productivity.	Aquatic and Riparian strategies 1– 7 and riparian buffer strategies in Appendix J	None at this time
Coastal Cutthroat, Willamette (Upper Willamette)	Habitat fragmentation or actions that increase population isolation. Water Quality. Alterations of hydrology and watershed function. Loss of estuarine habitat for rearing. Ocean productivity.	Aquatic and Riparian strategies 1– 7 and riparian buffer strategies in Appendix J	None at this time
Coho, Coastal	Stream complexity. Water quality. Fish passage. Riparian condition. Altered watershed processes. Marine Survival.	Aquatic and Riparian strategies 1– 7 and riparian buffer strategies in Appendix J	None at this time
Lamprey, Western Brook	Reduced water quality. Passage barriers. Altered flow patterns. Dredging. Rapid water drawdowns. Marine survival.	Aquatic and Riparian strategies 1– 7 and riparian buffer strategies in Appendix J	None at this time
Lamprey, Pacific	Reduced water quality. Passage barriers. Altered flow patterns.	Aquatic and Riparian strategies 1– 7 and riparian buffer strategies in Appendix J	None at this time

Common Name	Limiting Factors (LF)*	FMP Strategies that Protect or Maintains LF or Habitat	Additional SOC Strategies to address LF
	Dredging. Rapid water drawdowns. Marine survival.		
Lamprey, River	Reduced water quality and quantity. Passage barriers. Altered flow patterns. Dredging. Rapid water drawdowns. Predation.	Aquatic and Riparian strategies 1– 7 and riparian buffer strategies in Appendix J	None at this time

* Limiting Factors information taken from the 2016 Oregon Conservation Strategy (ODFW 2016).

Appendix C

References

Oregon Department of Forestry. April 2010. Northwest Oregon State Forests Management Plan. State Forests Program, Salem, OR.

Oregon Department of Forestry. 2023. *Draft Western Oregon State Forests Habitat Conservation Plan*.

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Oregon Department of Fish and Wildlife. February 2016. The Oregon Conservation Strategy, Salem, OR.

Oregon Department of Forestry. July 2000, updated September 2006. Forest Roads Manual. State Forests Program, Salem, OR.

Safe Harbor Agreement for the Northern Spotted Owl with Oregon Department of Forestry in the Oregon Coast Range Study Area for the Barred Owl Removal Experiment (U.S. Fish and Wildlife Service September 2016).

Oregon Biodiversity Information Center Database – 2022

Appendix D

Public Comment Summary

Public Involvement and Summary of Changes:

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

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

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

Changes in all Implementation Plans included:

- “Executive Summary”
 - Updated language to reflect adjustments made to ongoing policy work timelines
 - Provided additional clarity and language about considering new information from ongoing policy work.
- “Climate” – Updated language for clarity to include additional information about extreme weather events.
- “Planned Annual Harvest Objectives” - Added harvest and stand type language for clarity.
- “Young Stand Management” – Updated reforestation language to include additional information about seed sources and planting considerations.
- “Forest Health” – Updated silviculture activities to provide additional clarity.
- “Appendix A” – Updated take avoidance land T&E survey language to provide additional clarity.
- “Appendix D” – Added this appendix which summarizes the Public Comments

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

Implementation Plan/Habitat Conservation Plan Comments

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

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

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

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

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

Implementation Plan/Habitat Conservation Plan Response:

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

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

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

using during this transition period by implementing the State Forest draft Habitat Conservation Plan requirements while the State Forest Habitat Conservation Plan process is being completed.

HARVEST LEVELS COMMENTS

Comments related to State Forest timber harvest levels included:

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

Harvest Levels Response:

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

FOREST MANAGEMENT COMMENTS

Comments related to Forest Management on state forests include:

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

Forest Management Response:

Partial Cut/Thinnings in Habitat Conservation Areas: Some partial cuts for improving wildlife habitat consistent with the long-term goals of the Habitat Conservation Plan will

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

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

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

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

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

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

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

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

INSECT AND DISEASE COMMENTS

Comment received related to insect and disease management:

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

Insect and Disease Response:

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

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

WILDLIFE COMMENTS

Themes on wildlife include:

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

Wildlife Response:

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

STREAMS COMMENTS

Comments around stream health, protection and enhancement include:

- *Encourage State Forests to protect drinking water coming from healthy watersheds.*

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

Streams Response:

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

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

Aquatic Anchors and Terrestrial Anchor Sites: Aquatic Anchors are 6th field watersheds that were identified as important to aquatic species by the Aquatic and Riparian Specialist for ODF and Aquatic Specialists for Oregon Department of Fish and Wildlife. The watersheds selected support populations of salmonid and aquatic amphibian species of concern; contain high quality aquatic habitat for salmonids and/or aquatic amphibians; and contain an adequate proportion of state forest ownership to provide a reasonable likelihood that state forests management strategies will have a meaningful influence on watershed condition. Terrestrial Anchor Site locations were chosen collaboratively by

biologists from ODF and Oregon Department of Fish and Wildlife using data on the presence of species of concern, the habitat needs of those species while considering the current stand conditions and the likelihood of achieving complex stand structure in a timely manner. The Tualatin tributaries did not meet the criteria mentioned or were a lower priority for location for both the Aquatic Anchors and Terrestrial Anchor Sites at the time the designations were determined.

CARBON/CLIMATE COMMENTS

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

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

Carbon/Climate Response:

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

While the current Forest Management Plans and these Revised Implementation Plans don't address carbon or climate change directly, the implementation of these plans will result in a variety of forest stand conditions that maintain healthy, multi-species, vigorously growing forests, which will contribute to resilient healthy forests into the future. This is consistent with strategies within the Climate Change and Carbon Plan. Legacy structures retained within harvest areas will continue to store carbon while the new seedlings regenerating around these structures will accumulate carbon. Areas of the forest that have a desired future condition of Layered or Older Forest Structure, riparian areas, no

harvest wildlife areas, forested areas that are inoperable, etc. provide carbon storage throughout large portions of the landscape.

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

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

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

RECREATION COMMENTS

Comments received around public engagement in recreation development include:

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

Recreation Response:

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

ROADS COMMENTS

Comments around public access and new road construction include:

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

Roads Response:

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

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

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

outlined in the State Forest Roads Manual. All planned road construction is reviewed by the Geotechnical specialist to ensure that new roads are located in stable locations to provide the best protection to natural resources while meeting the objective of the road. Discussions are held regarding the long-term use of the road by ODF Staff for reforestation and future management, and whether a road needs to be surfaced or if it can be left unsurfaced. Financial costs of the construction and long-term maintenance are considered as well as potential impact to sale operations, anticipated closures related to weather, and long-term impact to wildlife and recreation.

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

MODELING COMMENTS

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

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

Modeling Response:

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

OUT OF SCOPE COMMENTS

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

- *Several commenters support ODF's commitment to Habitat Conservation Plan*
- *Keep current Habitat Conservation Plan process on track and don't redesign.*
- *Opposed to the Habitat Conservation Plan and the negative effects to rural Oregonians.*
- *Suggest removing the thinning acre limits in Habitat Conservation Areas in the draft Habitat Conservation Plan.*
- *Several comments recommending revisiting State Forests Habitat Conservation Plan to ensure conservation, production, sustainability, and supports rural Oregonians.*
- *BOF should set the minimum board foot harvest per year to provide clarity.*

- *Recommends adopting Private Forest Accord and rejecting proposed Habitat Conservation Plan that protects more than necessary to meet Endangered Species Act requirements and all water quality and environmental goals.*
- *Board of Forestry should direct ODF staff to prepare a revised Habitat Conservation Plan to get increase harvests levels to the levels proposed at the beginning of this process.*
- *Proposed Habitat Conservation Plan arbitrarily sets aside large areas of timber into non-production.*
- *Recommend ODF quickly redesign Habitat Conservation Plan that will ensure sustained harvests that are in line with the current 10-year average harvest volume of 250 million board feet.*
- *Habitat Conservation Plan was developed without proven environmental models that guarantee endangered species would actually be protected.*
- *Disagrees with large forest set asides to protect non-existent northern spotted owl sites on Clatsop County State Forests. The two current Northern Spotted Owl circles in Clatsop County State Forests have been vacant for years and could be scheduled to close soon.*
- *Noted that changing the flow of harvest volume, updating growth and yield tables, or increasing thinning harvests in the Habitat Conservation Areas won't be enough, only way to increase harvest is to reduce acres in the Habitat Conservation Areas and eliminate management restrictions on those lands to be managed outside of the Habitat Conservation Areas.*
- *One commenter noted that the draft Habitat Conservation Plan was drafted behind closed doors and is a high-cost initiative.*
- *Another commenter noted that there are more cost-effective measures the state could take to support sensitive wildlife.*
- *Other commenters recommended additional model runs showing shorter & longer rotations, new Private Forest Accord rules and scenarios around current sustainable harvest levels to inform the Board of Forestry around tradeoffs.*
- *The current draft Habitat Conservation Plan sets aside more acres than needed when considering the cumulative impacts globally by requiring the imports to replace sustainably produced Oregon products.*
- *Concern not enough is being done to protect the logging industry.*
- *People's livelihoods should come before an endangered species.*
- *Another suggested that federal government could financially support Oregon to prevent clearcutting the temperate rainforest that is the most efficient, self-sustaining weapon against climate change like it does other countries.*
- *ODF timber contributes to the marketplace that generates stable revenue for the counties and helps maintain the mill infrastructure and jobs are a key piece of the economic stability in small communities.*
- *Noted that the reduction in harvest as a result of the Habitat Conservation Plan is unreasonable compared to the level it was claimed to achieve with the draft Habitat Conservation Plan and what the draft Environmental Impact Statement projected.*
- *I oppose Senate Bill 803. I oppose House Bill 3158. I oppose Senate Bill 85. I wholly support Senate Bill 498 and Senate Bill 795.*

- *Request for grant to help steward 10 acres of private forest in Southwest Oregon.*
- *Oregon can't afford to shut down our state forests.*
- *Manage forests by clearing underbrush and allow sufficient timber harvest to house citizens and support counties.*
- *Taxpayers need proper forest management, proper road maintenance, proper harvested forests that actually proved more wildlife.*
- *Support State Forests protecting endangered species.*
- *One commenter noted that saving spotted owls and other species seems noble but questioned what animals survive forest fires.*
- *One commenter noted that Barred Owls are currently out-competing Spotted Owls. Large set-asides will not make the Spotted Owls more competitive and thus are not effective.*
- *One commenter noted not seeing proof of significant endangered species improvement on federal forests due large timber set-asides since 1999 so unlikely to see different results on State Forests.*
- *One commenter noted that Oregonians have the responsibility to sustainably manage all forest lands to meet goals of the global environment and not transfer our environmental responsibility to countries with far less strict policies.*
- *Some wilderness is fine but not too much.*
- *Consideration must be given to using our temperate rainforests to combat climate change Recommends deeding or selling State Forests to private enterprise.*
- *Environmental groups should not have more say than people who live in the area.*
- *ODF lands should be managed for maximum timber production while providing recreational opportunities and fish and wildlife habitat as it is currently.*
- *The Habitat Conservation Plan requirement that a minimum of 40% estimated spotted owl dispersal habitat will be maintained outside of Habitat Conservation Areas should be removed from draft Habitat Conservation Plan.*
- *Federal agencies have not required ODF to set aside more than half of the productive land base to achieve the conservation goals it desires.*
- *Forest workers are not prepared for the proposed diesel ban.*
- *Growing of inventory while maintaining the harvest level will add more habitat to sensitive species over time improving the outlook for all objectives the Habitat Conservation Plan will be addressing.*
- *Harvested lands provide good food sources for wildlife.*
- *One commenter noted complex forests provide a variety of trees, shrubs, soil microorganisms, pollinators, birds, and wildlife and are important for carbon sinks, erosion control, moisture release, drinking water, and providing cold water for endangered fish and wildlife.*
- *Several commenters noted that limiting harvest would lead to increase of wildfires.*
- *One commenter recommended that proper wildland fire protection is needed.*
- *One commenter noted that large set asides of timberland on Federal Forests in Oregon, Washington, and California now burn more proportionally each year, causing larger and immediate carbon gas releases and cost billions of dollars to fight forest fires over the years.*

- *Recommendation that State and Private forests should be managed and utilized to include carbon sequestering forest products.*
- *One commenter noted that State Forests should serve as a carbon sink as that is one of the greatest permanent values.*
- *One commenter proposed revising the current agreement and unhook dependence on timber harvests to supply their funding for schools and other services.*
- *Supports managing State Forests for greatest value including minimizing wildfire and other catastrophic events.*