**State Forests Program**

# Memo

**To:** Dave Lorenz, Area Director

**From:** Norma Kline, Acting District Forester

**CC:** Brian Pew, Deputy Chief State Forests,
Rob Nall, AOP Coordinator

**Date:** June 24, 2014

**Re:** Information Item - Approved Annual Operations Plan for 2015

---

The 2015 State Forests Annual Operations Plan for the Coos District is attached for your information. During my review of this plan, I have found that it is consistent with the *Elliott State Forest Management Plan*, all State Forest Operational Policies and the 2015 Annual Operations Planning Guidance. Additionally, all management activities comply with the Forest Practices Act.

Therefore, I have approved all management activities described in this plan.

New take avoidance policies for marbled murrelets has resulted in a shift of harvest acres into more of the 40-60 year old stands and less harvest of the mature stands. This shift provides less revenue and will not achieve the Annual Harvest Objective identified in the Implementation Plan. The new take avoidance policies are a direct result of *Cascadia Wildlands vs. Kitzhaber et al.* (case no. 3:12-cv-00961-AA).

During its preparation, this Annual Operations Plan was reviewed by technical specialists from within the department, biologists from the Oregon Department of Fish and Wildlife, United States Fish and Wildlife Service, and the Confederated Tribes of Coos, Lower Umpqua & Siuslaw Indians. We received their comments verbally and in writing (written comments are on file at the district office). The draft annual operations plan also underwent a 45-day public comment period. All comments were carefully considered and incorporated where appropriate. The changes resulting from public comments are summarized in Appendix E of the Coos District 2015 Annual Operations Plan.

Approval of this plan does not constitute final approval of individual project details. The management activities described in this plan may be modified during the final preparation and/or implementation. Modifications to these management activities will conform to the process included in the Annual Operations Planning Policy.

The official copy of this Annual Operations Plan will be on file at the district office. Additional copies are available at the State Forests Program office in Salem. The plan is also available on the ODF web site at:

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

APPROVED:

Norma Kline — 6/30/2014

Norma Kline — Date

Oregon
Kate Brown, Governor

**Department of Forestry**
Coos District
63612 Fifth Road
Coos Bay, Oregon 97420
541.267.4136
FAX 541.269.2027
http:/ /www.odf.state.or.us

"STEWARDSHIP IN FORESTRY"

February 2, 2016

**MEMORANDUM**

**To:** **Dave Lorenz, Area Director**

**From:** **Norma Kline, District Forester**

**CC:** **Liz Dent, Division Chief State Forests**
**Rob Nall, AOP Coordinator**

**Date:** **February 2, 2016**

**Re:** **Information Item – Elliott State Forest – Approved 2015 and 2016 AOP's**

All approved Coos District AOP's are consistent with the Elliott State Forest Management Plan and Implementation Plan, all State Forest Policies and the Annual Operation Plan Guidance. Additionally, all management activities comply with the Forest Practices Act.

However, at this time, I am withdrawing approval of six harvest operations listed in the 2016 AOP, including the following: Howling Glenn, Lower Trout, Bickfoot, Young Footlog, Bakers Cake, and Deer Joe Combo. I am also withdrawing approval of West Glenn Howell, which is listed in the 2015 AOP.

These modifications to the FY 2015 AOP and FY 2016 AOP were made at the request of the Oregon Department of State Lands.

**Approved:** Norma Kline
Norma Kline, District Forester

2/8/2016
Date


*"STEWARDSHIP IN FORESTRY"*

# COOS DISTRICT
# 2015
# ANNUAL OPERATING PLAN

# TABLE OF CONTENTS


INTRODUCTION....3

INTEGRATED FOREST MANAGEMENT OPERATIONS....5

**Timber Harvest Operations....5**

Overview of Timber Harvest Operations....5

Summary of Timber Harvest Operations by Basin....8

**Forest Roads Management....10**

Overview....10

Road Construction....10

Road Improvement....10

Road Access Management (Road Closures)....11

Road Maintenance....11

Land Surveying....11

**Young Stand Management....12**

Site Preparation....12

Planting....12

Vegetation Management....13

Tree Protection....13

Pre-commercial Thinning (density management)....13

**Recreation Management....14**

Overview of Recreation Management....14

Facilities (Campgrounds, View Points, Trail Heads, etc.)....14

**Land Exchange....14**

**Other Integrated Forest Management Operations....14**

Firewood Cutting Program....15

PLANNING (and Information Systems)....16

Stand Level Inventory and Other Vegetation Inventories....16

Fish and Wildlife Surveys....16

Table 3. Summary of status of T&E surveys....17

Aquatic and Riparian Resources....17

Research and Monitoring....17

Public Information and Education....19

Administration....20

Appendixes....20

# COOS DISTRICT

# 2015 ANNUAL OPERATIONS PLAN

## INTRODUCTION

This Annual Operations Plan (AOP) covers the state forestlands managed by the Coos District for the fiscal year 2015, which runs from July 1, 2014 through June 30, 2015. This plan describes how the activities and projects planned in the Elliott State Forest will achieve the goals and objectives of the 2011 Elliott State Forest Management Plan (FMP) and the Coos District Implementation Plan (IP). Refer to these documents for details on strategies. These activities include the following integrated forest management operations: commercial harvest operations; road construction, road improvement and maintenance; reforestation and young stand management; recreation; and planning.

This summary document will give an overview of the operations, and includes tables giving a number of details including estimates of volume and acres to be harvested, project costs, and gross and net revenues, and acres and cost estimates of planned reforestation and young growth management operations. More detail on harvest operations is available in the individual Pre-Operations Reports, which are available by request. A public involvement summary (Exhibit E) will be added to the final plan.

A new FMP and IP were approved for implementation on January 1, 2012. This revised FMP describes the resource management concepts and strategies and incorporates take avoidance strategies. The IP describes specific descriptions of each basin and provides the harvest and silvicultural goals for the 10 year period.

Coos District manages 93,524 acres of state forestland primarily in the southern coast range, but with some scattered tracts in the Klamath Mountains in southern Coos and Curry counties. About 91% of the lands managed by the Coos District are Common School Forest Lands (CSFL) owned by the State Land Board and managed for them and the Board's administrative agency - the Department of State Lands - by ODF. All revenue from CSFL goes to the Common School Fund and ODF is reimbursed from the Fund for management expenses. The remaining 9% are Board of Forestry lands. Approximately two-thirds of the revenue from BOF lands is distributed to the county where the land is located, with the remaining one-third going to ODF for management expenses. The main ownership is the Elliott State Forest, which is one block of about 91,224 acres located just south of the Umpqua River between Reedsport and Scottsburg on the north and between Coos Bay and Allegany on the south. The Elliott is divided into 13 management basins representing sub-watersheds in the forest. Additionally, some 2,082 acres of Common School Land and 218 acres of Board of Forestry small tracts are scattered between the California border in the

south, up to the South Slough Estuary on the west, adjacent to Winchester Bay to the northwest, and to about Winston and Elkton on the east. Note that the acres detailed throughout the report express net acres, unless otherwise stated. Net acres are based on orthophotos and GIS and exclude roads, non-required thinning areas, stream buffers, other buffers and green tree retention areas.

Table 1 compares the proposed acres by harvest type[1] in this AOP to the harvest acre ranges specified in the IP. Total planned acres in this AOP are 506 net acres (approximately 0.5% of the district's total acreage) which is less than the annual acreage estimate. The anticipated harvest acres, volume, and revenue for each proposed operation in this AOP are listed in the "Harvest Operations – Financial Summary" table in Appendix B, while a vicinity map of these harvest operations can be found in Appendix C.

Table 1. Annual Operations Plan objectives compared to annual estimated silvicultural activities identified in the Coos District IP. All values are net acres.

| Silvicultural Activity | Elliott FMP & IP Annual estimate | 2015 AOP |
|---|---|---|
| Partial Cut Harvest | 0 - 500[1] | 0 |
| Regeneration Harvest | 700 – 1000 | 506 |

[1] Partial cutting will be done as necessary to meet silvicultural objectives.

The FY 2015 operations plan includes both activities that take place "on the ground" within the fiscal year as well as operations that have contracts prepared within the fiscal year, but are actually accomplished in a future fiscal year. The proposed timber sale is planned to be designed, and submitted for processing during the FY15 time period. The actual on-the-ground operations will likely not occur during FY15 due to the time lag associated with contract duration. In contrast, reforestation and young stand management will be carried out during the FY15 time period.

The Forest Land Management Classification System (FLMCS) has been adopted into the 2011 Management Plan. The Board of Forestry approved changes to the FLMC Administrative Rule (OAR 629-035-0055) on June 5, 2013. This change to the FLMC Rule replaced the Special Stewardship with two other classifications (High Value Conservation Areas and Special Use Areas) and made some changes to the definitions of the subclasses. Proposed changes to the FLMC are described in detail and mapped in Appendix A of this document. At the close of the public comment period, the District Forester will forward these changes with any public comments to the Area Director and State Forester for review and approval. The FLMC baseline began with the 2011 Coos District Implementation Plan, Pages 8-9. The classifications have been updated each year in accordance with each annual operations plan, and have been adjusted in the FY 2015 to accommodate the two new classifications described above.

[1] The definitions of the harvest types used to describe timber harvesting on State Forests can be found on the State Forests website under Forest Management and Planning. Briefly, a Modified Clearcut is the most common of three type of Regeneration Harvest (or clearcut) that may occur on State Forests. The defining characteristics of Modified Clearcuts are that they meet the structural component standards of the FMP (green tree, snag, and down wood).

# INTEGRATED FOREST MANAGEMENT OPERATIONS

## Timber Harvest Operations

### Overview of Timber Harvest Operations

The FY15 harvest operations are estimated to generate gross revenues of approximately $4,236,000 and net revenues of $3,916,155. It is estimated that active management will result in producing approximately 12.5 million board feet of conifer volume, 0.5 million board feet of hardwood volume, for a total of 13 million board feet. In addition to the above revenue and volume, some sales are expected to have pulp removed from sale areas. The amount and value of pulp is difficult to predict during the planning process but will likely occur in areas of regeneration harvest using whole tree yarding systems. This material also has potential for use in biomass operations. 80% of the projected value is from Common School Land and 20% of the projected value is from Board of Forestry land. Refer to the attached Financial Summary table for more detail on volumes and values. Because of the uncertainties due to T&E species, the final conifer regeneration harvest acres/volume and value are projections.

Under the ESF FMP and IP, protocol surveys for northern spotted owls (NSO) and marbled murrelets are required. Density surveys for NSO's have been conducted during 2010, 2011, 2012, and 2013 survey seasons covering the entire Elliott and were completed according to ODF's policy. Surveys for marbled murrelets are conducted using ODF's policies in potential suitable habitat - defined as stands dominated by Douglas-fir that are at least 100 years old or younger stands that have a component of residual trees. Many operations in the FY2015 sale plan have been surveyed for northern spotted owls and released for sale. Additionally, all primary operations with potentially suitable habitat have been surveyed at least one year for marbled murrelets. Several operations do not include marbled murrelet habitat. See Table 3 for more information about T&E surveys.

All of the harvest operations have been reviewed by ODF's wildlife biologists, aquatic specialist, geotechnical engineer, state forest engineer, and operations coordinator. Information on operations that occur within the provincial circle of a northern spotted owl has been provided to the US Fish and Wildlife Service. Occasionally, operations may contain a resource or activity where review with another state agency, such as the Department of Agriculture or the Department of State Lands, is warranted. Written comments from the external resource specialists and the resolution of those comments will be included as Appendix D of the final plan.

Surveys have also been, or will be conducted to determine stream classification of all streams associated with planned harvest areas. A written plan will be prepared in accordance with the Forest Practice Act for operations within 100 feet of a Type F stream.

Cable layouts through or over buffer strips are needed to provide for adequate suspension of logs. To protect water quality, full suspension will be required over stream channels and single end suspension where feasible on the rest of the sale area. During active operations a variety of methods will be used to prevent sediment from entering live streams. These methods include (but are not limited to) maintaining road surfaces, culverts and other road drainage structures, applying seasonal restrictions to haul routes, and monitoring and managing logging and hauling operations during times of heavy rainfall. Riparian areas along streams will be managed to support properly functioning aquatic habitats over time by applying the riparian management area (RMA) standards of the ESF FMP.

The units are reviewed by an ODF Geo-technical specialist to determine the potential for deliverability of wood via debris flows or torrents originating in the units. Debris flow track reaches receive the vegetation retention practices as prescribed in the Management Standards for Aquatic and Riparian Areas or in the case of public safety, comply with the Forest Practices Act retention standards.

To minimize yarding impacts on the slopes, single end suspension cable yarding will be required. Roads will be located on ridge-crests as much as possible and any steep sidehill portions will be constructed with full bench end-haul design and construction.

Application of Riparian Strategies

All sales in the FY15 AOP will be prepared using the aquatic-riparian strategy from the ESF FMP. Please refer to this plan for detailed information on the strategy[3]. The application of the strategy is accomplished by first determining the stream classification, and then during the sale layout process measuring the buffer distances and counting conifers for each stream. Additional trees needed to comply with the ESF FMP aquatic-riparian strategy are either included by increasing the buffer distance or by individually marking trees as wildlife trees above the minimum width buffer, but within the distances required in the ESF FMP aquatic-riparian strategy.

Old Growth

Reserving remnant old-growth trees - trees over 175 years old as of 2010 - is a district policy and protecting old growth stands is an FMP policy. Care is taken to walk through the units and mark the residual old-growth as green tree retention. The only exception to this policy is if an old-growth tree is located where it impedes operability or causes a hazardous situation.

Plants

The sale areas are checked against district knowledge for any listed plant location. The sale areas are also checked against the Oregon Biodiversity Information Center (OBIC) database of known listed plant locations. Protection measures appropriate to the species would be implemented if listed plants were found within the harvest units.

[3] http://www.oregon.gov/odf/state_forests/docs/esf/elliott_fmp_2011/elliottsf_2011_fmp_final.pdf - Page 5-22 through 5-33

## Clearcut Harvests

The ESF IP describes goals for the clearcut harvesting of 700 - 1000 acres on an annual basis and 0 -500 acres of partial cut. This AOP does not meet the IP goal for harvest.

The clearcut timber sales in this plan have been selected to maintain adequate nesting, roosting, and foraging (NRF) habitat acreage for northern spotted owl provincial circles in accordance with State Forests policy. This practice is designed to maintain a diversity of age classes in the Elliott in keeping with the stand structure objectives. The locations of timber sale units were selected using legal requirements of FPA green-up, public safety areas, conservation areas, logistical issues of providing buffering between sold sales and murrelet survey areas, and maintaining logical harvest settings. Marbled Murrelet Management Areas (MMMA's) and Steep, Unique, and Visual (SUV) areas are excluded from harvest consideration.

## Carbon

The Elliott State Forest and Pacific Northwest forests in general have the potential to sequester great amounts of carbon. A study completed by Ecotrust for the Elliott State Forest modeled five harvest level scenarios and resulting carbon storage potential of each harvest level. Data taken from this study shows the carbon sequestered each year on the Elliott State Forest is 800,000 tonnes of CO2 per year from 2010 to 2015.[4] The 2015 AOP timber harvests will release 26,000 tonnes of CO2 into the atmosphere. Thus, during the 2015 AOP, the Elliott State Forest will sequester 774,000 tonnes of CO2. This amount of sequestered carbon is equivalent to the annual emissions of 151,000 cars.[5]

## Commercial Thinning

There are no thinning sales planned in the 2015 AOP.

## Forest Health

ODF's primary long-range plan to deal with Swiss needle cast (SNC) and unknown future forest health problems is to plant a greater diversity of species. ODF is a member of the SNC Cooperative, which is looking for additional ways to control this disease. In addition, Douglas-fir resistance to SNC is being tested by the South Central Coast Tree Improvement Cooperative. Coos District is a member of this cooperative.

---

[4] Carbon Analysis of Proposed Forest Management Regimes on the Elliott State Forest, Table 11. http://www.ecotrust.org/forests/Carbon_Analysis_of_Elliott_State_Forest.pdf

[5] http://www.epa.gov/oms/climate/documents/420f11041.pdf

Port-Orford cedar root rot, which can potentially kill both Port-Orford cedar and Pacific yew, is not a significant issue on the Elliott. Though the Elliott is within the range of Port-Orford cedar (POC), no natural POC has been documented in an inventory of the Elliott. A total of 6 acres of Port-Orford cedar was planted on the Elliott in 2002 - 2003. Scattered Pacific yew does exist in the Elliott. The only known location of the POC root rot is in a 1-2 acre plantation that was planted on the lower end of Palouse Creek. Vehicle access to this area is blocked off year-round to protect fish and wildlife, which effectively prevents spread of POC root rot through vehicle traffic. To our knowledge POC root rot does not exist elsewhere on the Elliott. On the Winchester Creek scattered tract, equipment washing will be implemented prior to leaving the site to minimize the risk of spread of possible POC root rot.

Sudden Oak Death has not been identified in the Elliott. Locations in Oregon where it has been identified have been quarantined by the Oregon Department of Agriculture to control its spread. ODF, in cooperation with the USFS, conducts annual statewide aerial surveys to identify areas with insect and disease problems, including Sudden Oak Death.

**Summary of Timber Harvest Operations by Basin**

In the following section, the commercial forest management operations planned for FY15 will be summarized in the context of the management basins on the Coos District. Only those management basins that have planned harvest will be discussed. The 2011 FMP and IP identify 14 management basins. Basins 1 -13 encompass the Elliott and basin 14 is inclusive of the scattered tracts. This section is a summary of the operations by basin, and is not meant to completely describe the planned operation. Refer to Appendix B, Table 4 for more detail of each operation.

**Basin 3 – Dean Johanneson**

**Hakki Headwaters (Primary)** – This sale is a 79 acre , 3rd growth, 1 unit clear cut.

Special Considerations: The northern boundary of this sale abuts a private landowner. Property line surveys will need to be completed.

**Basin 4 – Scholfield Creek**

**Lean Dean (Primary)** – This sale is a 21 total acre, 2nd growth, 2 unit clear cut.

Special Considerations: None.

## Basin 5 – Big Creek

**Wilkins Murphy Divide (Primary)** – This sale is a 63 total acre, 2nd growth, 3 unit clearcut.

Special Considerations: This sale is within a NSO provincial circle. A Biological Assessment has been prepared to assess potential impacts to the NSO.

## Basin 9 – Henry's Bend

**Eleven Creek Headwaters (Primary)** – This sale is 51 total acre, 3rd growth, 1 unit clearcut.

Special Considerations: This sale is buffered from nearby harvests to ensure compliance with the Forest Practices Act.

## Basin 10 – Marlow Glenn

**Lower West Glenn (Primary)** – This sale is a 111 total acre, 3rd growth, 3 unit clearcut.

Special Considerations: Portions of this sale are within a NSO provincial circle. A Biological Assessment has been prepared to assess potential impacts to the NSO.

**West Glenn Howell (Primary)** – This sale is a 48 acre, 3rd growth, 1 unit clearcut.

Special Considerations: None.

## Basin 12 – Trout Deer

**Deer Creek Headwaters (Primary)** – This sale is 17 total acres, 3rd growth, 1 unit clearcut.

Special Considerations: Portions of this sale were originally included in the FY13 sale plan as Dean's Deerstand. Harvest of Deer Creek Headwaters will not overlap the Dean's Deerstand sale.

## Basin 13 – Ash Valley

**Salander Ridge (Primary)** – This sale is a 51 total acre, 3rd growth, 2 unit clearcut.

Special Considerations: This sale is within a NSO provincial circle. A Biological Assessment has been prepared to assess potential impacts to the NSO. ODF's geotech will plan a site visit to ensure protection of any downslope structures on adjacent private property.

## Basin 14 – Scattered Tracts

**Winchester Creek (Primary)** – This sale is a 65 acre total acre, 3rd growth, 2 unit clearcut.

Special Considerations: This North and West boundaries of this sale area are adjacent to the South Slough National Estuarine Research Reserve (SSNERR). The closest recreation area is more than ½ mile from the sale boundary.

## Forest Roads Management

### Overview

The following is a summary of forest road projects that are anticipated to be accomplished as part of the proposed timber sales in the 2015 fiscal year. All sales planned in the FY15 AOP have had a slope stability risk assessment by an ODF geotechnical specialist. As needed, the geotechnical specialist will make site-specific road and engineering recommendations for practices to achieve resource and economic goals for the forest consistent with the Elliott FMP and IP. For detailed information on the risks associated with clearcut harvesting on steep slopes in the Tyee Core Area, please refer to the following research paper: Robison, E.G., K. Mills, J.T. Paul, L. Dent, and A. Skaugset. 1999. Oregon Department of Forestry 1996 Storm Impacts Monitoring Project: Final Report. Forest Practices Technical Report #4. Oregon Department of Forestry, Salem Oregon, 141 pp.

### Road Construction

For FY 2015, 0.8 miles of new road construction is planned for a total cost of $74,845. The Roads Summary Table (Appendix B, Table 6) specifies sale specific project costs. Further analysis during sale preparation may determine that in some cases the addition of new roads would provide better options in regard to safety and environmental impact. For example there may be a more suitable location to position a yarder for guyline anchors and skyline road alignment. All road construction and improvement will be done during favorable weather and excavated material will be deposited on stable slope locations with very low risk of entering stream channels. Project work that results in exposing bare soil will receive an application of grass seed during the first seeding season following harvest to assist with erosion control. The method commonly used in this process involves mechanical hand seeders. A proven mix of ryegrass seed referred to as BLM mix is used.

### Road Improvement

7.8 miles of road improvement are identified for a cost of $135,000. Various prescriptions for road renovation will be required, including but not limited to, resurfacing with hard crushed quarry rock, replacing culverts that are damaged or undersized, installing culverts at new locations in order to achieve proper spacing and ditch water diversion, grading and

ditching, widening, and roadside brushing. Also, potential hazards associated with the road systems, such as old sidecast material or sub-surface drainage problems, will be identified and corrected. Primarily the objective is to minimize the impact forest roads have on slope stability, water quality, and wildlife and in general the surrounding environment and at the same time provide an adequate, safe and efficient transportation system.

**Road Access Management (Road Closures)**

All of the roads that fall under this operations plan that are not surfaced will be closed to traffic, with the exception of ATV'S for reforestation purposes, once the operation is complete. The most common method of closing is to construct a tank trap or place large boulders at the road junction. A tank trap is a deep ditch between two large mounds of dirt. The road surface will be water barred at intervals proportional to gradient. Seasonal water-bars and closure may be necessary if an operation continues through two or more seasons.

**Vacated Roads -** None planned in the FY 2015 AOP.

**Road Maintenance**

The Elliott State Forest maintains an average of 320 miles of road annually. Road maintenance on the Elliott State Forest is accomplished by a road maintenance contractor at an average yearly cost of $250,000. Declining budgets have reduced the road maintenance budget to $125,000 in FY 2015. The road maintenance contract does not include the delivery of rock stockpiles, which are used by the maintenance contractor to surface and repair roads. In the 2015 AOP, one rock stockpile is planned to be included in one timber sale contract, as project costs, for a total of $25,000. The focus of road maintenance activities for FY 2015 will be to prevent resource damage and insure compliance with the Forest Practices Act. Road maintenance activities that may occur during Fiscal Year 2015 include grading road surfaces to maintain a smooth, stable running surface and to retain the original surface drainage. Surfacing material may be added or replaced as necessary on road segments that experience a breakdown or loss of surface material. Culverts, catch basins and ditches will be cleaned as necessary to ensure proper drainage. Worn out, damaged or undersized drainage structures will be replaced as necessary to prevent resource damage. Cut and fill slopes will be monitored for any changes that could result in damage. Problems most often encountered include raveling, erosion and slumping. Slides in roadbeds will be removed and old sidecast material will be pulled back from the road shoulder where slumping or tension cracks occur. Roadside vegetation control measures may be taken to improve visibility, drainage and slope stability.

**Land Surveying**

Seven primary operations in the 2015 AOP are adjacent to property lines. Lower West Glenn and West Glenn Howell do not require any surveying. Eleven Creek Headwaters, and portions of Winchester Creek, and Salander Ridge have had recent property line surveys and will require refreshing of approximately 7,840 feet of property lines.

Approximately 9,500 feet of property lines will need to be surveyed for Hakki Headwaters, Wilkins Murphy Divide, and portions of Winchester Creek, and Salander Ridge. Survey corner monuments that are near or within sale area boundaries need to be located and marked.

## Young Stand Management

Total expenditures of young stand management for the 2015 AOP is estimated to be $234,075. The breakdown of individual activities is located in the Reforestation and Young Stand Management Report (Appendix B, Table 7). Planned operations in the FY15 AOP were designed to be in compliance with the current ESF Management Plan, Implementation Plan, and state and federal laws. Herbicides are applied in compliance with the label and the rules of the Forest Practice Act.

### Site Preparation

Two-hundred-twenty-five acres of aerial chemical site preparation is planned for a total cost of $20,250. The goal of site preparation projects is to reduce vegetative competition and minimize tree seedling mortality during the first five years after planting. The primary and most cost-effective site preparation tool used by Coos District is aerial application of herbicides. Coos District uses means other than herbicides when appropriate such as burning or mechanical release (i.e. chainsaws). Approximately 10-15% of each year's regeneration harvest acreage (units) are not treated with herbicides to promote growth of forage for deer and elk and other species. Units are typically aerial site-prep sprayed once during the rotation length of the stand (i.e. 80 years).

### Burning

Zero to 50 acres of burning is planned for a cost of zero to $6,250. Burning is an alternative site preparation practice prescribed for the south aspect slopes of several units in each AOP. The main purpose of burning is to diversify the results of site preparation and to provide big game forage. However, portions of sales may also be burned to attain adequate stocking if planting sites are too few. The forb and grass competition resulting from burning provides forage to deer and elk. Burning is completed when duff moisture is adequate to avoid heat intensities that would damage soil. Areas chosen for burning have southern exposures, and a distribution of slash that can successfully spread fire.

### Planting

Two-hundred-twenty-five acres of initial planting is planned for a cost of $81,000. One-hundred-sixty acres of inter-planting is planned for a cost of $22, 400. This operations plan will include several stock types and a mix of species. The density and species mix will vary through time to meet the goals for the stand. The stock type will vary to provide the best balance of vigorous cost-effective stock. Thirty to forty percent of seedlings planted will be minor species, primarily hemlock and western red-cedar, to provide for diverse habitat and reduce the effects of Swiss needle cast and other diseases. In addition, the species mix on

the Winchester Creek scattered tract will include root rot resistant Port Orford Cedar and Swiss needle cast resistant Douglas-fir as well as Sitka spruce and western hemlock.

### Vegetation Management

Release operations: 100 to 245 acres of vegetation release is planned for a cost of $13,848 to $33,775. These treatments are planned as needed to reduce competing vegetation. The purpose is to keep stands free to grow, keep stands vigorous and healthy and to increase return on investment. Most release treatments will be ground treatments: Hack & squirt with imazapyr, thin-line, or a ground based foliar application of triclopyr in water for Scotch broom, and manual release by inmates with chain saws. Aerial release operations, if needed, will be late-foliar applications of glyphosate in the fall or possibly 2,4-D in May.

Noxious or non-native plant control: 110 acres of noxious plant control is planned for the 2015 AOP for a cost of $5,500. We are working to control gorse, Scotch broom and other plants of concern identified as noxious by the Oregon Department of Agriculture. Integrated pest management will be used which may include the use of a range of control measures including mechanical, herbicides, and biological control including the overtopping of some plants by conifer plantations.

### Tree Protection

Four-hundred to five-hundred-twenty-five acres of mountain beaver trapping is planned at a cost of $16,044 to $21,000. Damage by mountain beaver can have significant impacts on stand stocking and growth. Mountain beaver trapping is prescribed on all clearcut harvest units under the 2015 AOP and recent AOP clearcuts. This is done to reduce the mortality and damage of seedlings to acceptable levels. Species other than Douglas-fir may be treated with vexar tubing (20 acres, $2,800) or big game repellant (165 acres, $6,600) to help reduce the damage caused by deer and elk.

### Pre-commercial Thinning (density management)

Zero to 230 acres of pre-commercial thinning (PCT) is planned at a cost of zero to $34,500. PCT reduces the amount of time for a stand to become large enough for commercial thinning or clearcut harvest.

Harvest units are typically thinned to about 258 trees per acre, which will produce about an 11 inch diameter at breast height (DBH) 'take tree' at the first commercial thinning around age 35-40. In some stands where it is impractical to do an early commercial thinning, the distance between leave trees will be increased to keep them from becoming stagnant at a young age.

In past years the effects of Swiss needle cast (SNC) were thought to be accelerated by PCT. Currently, ODF's forest pathologist, researchers at Oregon State University and the

SNC Coop do not predict that PCT will increase the effects of Swiss needle cast on Douglas-fir. At the present time the recommendation is to apply normal PCT treatments.

## Recreation Management

### Overview of Recreation Management

Based on past assessment of needs and policies, there is very little formal recreation management on the Elliott State Forest. The Elliott is relatively lightly used for recreation, much of it occurring along the roads, rivers, and streams. The recreation that does occur is mostly confined to hunting, fishing, camping, and picnicking. Most recreation use is informal dispersed recreation, with the main users being the local residents who live in nearby communities. Local residents are attracted to the Elliott because its recreation is dispersed and unimproved, with few recreationists competing for favorite sites.

### Facilities (Campgrounds, View Points, Trail Heads, etc.)

At the current time there are only two developed recreational facilities on the forest – both on Board of Forestry land. The Millicoma Interpretive Center (MIC) is a fish hatchery and educational outreach facility on the West Fork Millicoma River operated by the ODFW. Salmonids, including chinook, steelhead, and Coho salmon, are spawned, reared, and acclimated at this facility to support fishery programs. The center also provides a hands-on approach to learn about the salmon life cycle to schools and groups who visit the facility. A short forest trail is associated with MIC for use by visitors.

Camp Millicoma – adjacent to MIC - is no longer managed by The Friends of Camp Millicoma. Department staff is reviewing options for continued recreational use at this location.

**Trails** – No planned management.

**Land Exchange** - None planned for fiscal year 2015.

## Other Integrated Forest Management Operations

Cooperation and participation with Coos Watershed Association, Partnership for the Umpqua Rivers, and the Tenmile Lakes Basin Partnership will continue during the 2015 AOP period. Stream enhancement, restoration projects, and watershed and project monitoring are likely activities during this period. Riparian management activities on the ESF support the goals of the Oregon Coastal Coho Conservation Plan which are to create conditions in which Coho are sufficiently abundant, productive, diverse and self-sustaining

and provide substantial environmental, cultural, and economic benefits within the state of Oregon.

During the 2015 AOP, the Coos District has plans for in-stream log and boulder placement activities on Joe's Creek and the West Fork Millicoma River. This in-stream work is planned to utilize up to 35 whole trees, 73 conifer logs, and 30 root wads to improve in-stream habitat for salmonids, particularly listed Coho salmon. Additionally, an old, failed log stringer bridge on the 9380 road will be removed while logs from the bridge will be used for fish enhancement in the small unnamed type F stream. These stream enhancement projects are being completed in collaboration with the Coos Watershed Association.

The Coos District will continue to sell permits to harvest special forest products on a request basis, consistent with product availability and protection requirements. This has amounted to annual revenue of approximately $350 for the last several years.

**Firewood Cutting Program**

The primary objective of the District Firewood Cutting Program is to provide a source of firewood from State Forests to the public for personal use and secondarily to reduce fuel hazards, improve visibility along roads, and provide a recreational opportunity. The District's Firewood Cutting Program is tied to the completion of timber sales. Timber sale contracts require any non-merchantable wood or cull material that has been yarded to the landing and is suitable for firewood to be placed in a pile.

State Forests are managed for multiple benefits, and snags, downed wood and stumps are important habitat components under our Forest Management Plan. Permittees are required follow the permit instructions, review the permit and district maps, and consult with ODF personnel to ensure they remain on State Forest land. Property lines are frequently unmarked and ODF firewood permits are only valid on State Forest land. Harvesting firewood without the landowner's permission is trespass.

Firewood is a high-risk vector for wood-boring insects, such as emerald ash borer and Asian longhorned beetle, two species responsible for widespread defoliation of forests in Midwest and Eastern states. The Oregon Invasive Weed Council and ODF encourage people to obtain their firewood in a place as close as possible to the place where it will be burned. Recreationists have a role in protecting forests by not moving firewood great distances.

The public will be notified of firewood cutting permits through the district's telephone recording (541-267-1774) and posting at the district office. Permits will be issued for differing lengths based on resource conditions and amount of wood available, during the months outside the fire season. Coos Fire Protective Association (CFPA) regulates fire season and is generally from July 1st through October 15th.

A limited number of personal firewood cutting permits will be issued to the public, on a first come-first served basis, with a limit of two permits per individual or household within a firewood cutting season from fall through spring. The permit cannot be used to sell firewood

to another party. Firewood cutting permits will be issued and administered to public employees under the same processes used by the public. Oregon Department of Forestry does not guarantee the quality or availability of wood when issuing firewood cutting permits. Exceptions to the two-cord limit may be made for non-profit organizations, with prior district authorization. Approximately 200 personal firewood cutting permits are issued each cutting season, though fewer permits have been available in the recent past due to reduced harvest levels.

Designated firewood cutting areas will be marked on the permit map, which excludes active and sold timber sales, recreation sites, and planned operations. There is no guarantee that units or travel routes will be posted in the field.

Enforcement of firewood cutting permits will be accomplished by contracted law enforcement officers and following ODF's Firewood Cutting Guidance described in section 12.2.G1.2.2. Additional firewood cutting permit requirements and guidelines are provided with the permit.

# PLANNING (and Information Systems)

### Stand Level Inventory and Other Vegetation Inventories

**Stand Level Inventory**: Inventory is planned on 49 stands in the 2015 AOP. The inventory will be performed by a private contractor as part of a statewide contract.

**Stocking surveys and young stand fixed plots**: These inventory projects as part of normal reforestation efforts identify stocking levels and growth rates and will be used to develop stand management prescriptions. Prescriptions can include inter-planting, release, animal damage control, and PCT.

### Fish and Wildlife Surveys

Under the 2011 ESF FMP and IP, surveys of proposed timber sales for northern spotted owls are required on the Elliott. Density surveys for NSO have occurred in calendar years 2010, 2011, 2012, 2013 and are planned for 2014. These surveys show population density data and will provide two years of ongoing surveys as required by ODF's NSO Policy.

Surveys for marbled murrelets will be completed on stands containing or adjacent to potentially suitable habitat proposed for inclusion in the fiscal year 2015 sale plan to meet harvest objectives.

Physical Habitat Surveys are done in the spring by ODF foresters to determine the upper extent of fish use in streams associated with timber sales.

**Table 3. Summary of status of T&E surveys.**

| Operation | Species (NSO/MM)[1] | Status |
|---|---|---|
| ESF Density | NSO | Fifth year survey in 2014. Current survey expiration is March 15, 2016. |
| Little Salander Headwaters | NSO | Federal ownership surveyed 2013, survey 2014 |
| Salander Ridge | NSO | Federal ownership surveyed 2013, survey 2014 |
| Deer Creek Headwaters | MM | Non-Habitat |
| Hakki Headwaters | MM | Non-Habitat |
| Lean Dean | MM | Surveyed 2013, survey 2014 |
| Eleven Creek Headwaters | MM | Non-Habitat |
| Lower West Glenn | MM | Non-Habitat |
| West Glenn Howell | MM | Non-Habitat |
| Wilkins Murphy Divide | MM | Surveyed 2013, survey 2014 |
| Salander Ridge | MM | Surveyed 2013, survey 2014 |
| Winchester Creek | MM | Surveyed 2013, survey 2014 |

[1]Surveys are conducted according to accepted protocols when habitat for the specific species is determined to be present. NSO – northern spotted owl, MM – marbled murrelet.

## Aquatic and Riparian Resources

Fish log placements planned as part of the Wilkins Murphy Divide timber sale were the result of recommendations of the 2003 Elliott Watershed Analysis. The objective of the analysis was to compile information on water, fish, and wildlife issues that the Elliott State Forest will face in the near future and assess the historic, current, and future conditions of these resources. The analysis was tailored specifically to objectives for the Elliott State Forest and provides analysis for the Coos, Tenmile Lakes, and Umpqua watersheds within the Elliott. Additionally, the analysis includes an evaluation of social issues, such as human uses of the forest. The analysis is being used to support the Elliott's current Forest Management Plan, Implementation Plan, Annual Operation Plans, and for future adaptive management.

## Research and Monitoring

The 2011 Elliott FMP contains a commitment to develop a 10-year research and monitoring plan linked to the FMP and IP. This plan was completed by the end of calendar year 2012. The plan describes the general monitoring issues to be addressed; provide a framework to aid prioritizing and developing specific monitoring projects to assess the effectiveness of the management strategies; guide development of annual operations plans to support monitoring projects; and describe funding mechanisms and how available funding will be prioritized among projects. The Department of State Lands is currently considering a funding level for the plan.

The Riparian and Stream Temperature ("RipStream") monitoring Project has been active in the Oregon Coast Range since 2002. Field work is complete and data analysis is ongoing. The project consists of 33 sites with about half on private forests and half on state forests.

The objectives of this study are to evaluate effectiveness of Forest Practices Act and Forest Management Plan riparian strategies in protecting stream temperature and promoting riparian functions for the protection of fish and wildlife habitat. Baseline and post-harvest results have been published in three peer reviewed journal articles. Results indicate high variability in temperature patterns prior to harvest (Dent et al 2008)[7]. Results also indicate that current NW FMP State Forests Riparian Strategies are effective at meeting DEQ standards for "protecting cold water" (Groom et al 2011a and 2011b)[8]. The average harvest effect on maximum temperature by site (n=15, 3 of which were in or near the Elliott State Forest) was 0.0 C ( range -0.87 to 2.27 C) " (Groom et al 2011b)[9]. These strategies are also used on the Elliott State Forest.

Coos District has been a participant in the Northwest Tree Improvement Cooperative since its founding over 30 years ago. The district is currently in the process of second generation testing. The district is also a participating member of the Stand Management Cooperative. A test site is located on the Elliott and district staff has been assisting in the measurement and maintenance of these plots since the beginning of the research. Forest-wide permanent plots were established on the forest in 1998. We also participate in the Swiss needle-cast cooperative and have some plots installed in some young commercial thinning stands as a part of a study by this cooperative.

Permanent plots are being monitored on both the Lower Skunk Stand Management sale and the Hidden Valley Stand Management sale. These sales were designed to enhance owl and murrelet habitat under the 1995 HCP.

---

[7] **Dent et al 2008**: Dent, Liz, Danielle Vick, Kyle Abraham, Stephen Schoenholtz, and Sherri Johnson, 2008. Summer Temperature Patterns in Headwater Streams of the Oregon Coast Range. Journal of the American Water Resources Association (JAWRA) 44(4):803-813. DOI: 10.1111/j.1752-1688.2008.00204.x

[8] **Groom et al 2011a**: Groom, J. D., L. Dent, and L. J. Madsen (2011), Stream temperature change detection for state and private forests in the Oregon Coast Range, Water Resour. Res., 47, W01501, doi:10.1029/2009WR009061.
**Groom et al 2011b**: Groom, J.D., et al. Response of western Oregon (USA) stream temperatures to contemporary forest management. Forest Ecol. Manage. (2011), doi:10.1016/j.foreco.2011.07.012

[9] **Groom et al 2011a**: Groom, J. D., L. Dent, and L. J. Madsen (2011), Stream temperature change detection for state and private forests in the Oregon Coast Range, Water Resour. Res., 47, W01501, doi:10.1029/2009WR009061.
**Groom et al 2011b**: Groom, J.D., et al. Response of western Oregon (USA) stream temperatures to contemporary forest management. Forest Ecol. Manage. (2011), doi:10.1016/j.foreco.2011.07.012

# Public Information and Education

The most significant planned activity in this area will be the Annual Operations Plan process including the public comment period.

District personnel routinely participate in and are voting members of the Coos Watershed Association and the Tenmile Lakes Basin Partnership, and are also non-voting members of the Partnership for Umpqua Rivers. This activity enables the district to keep the watershed councils informed of district operations, to participate in planning watershed enhancement activities, and to receive information from neighboring landowners and other interested parties on concerns they have about the Elliott State Forest.

Each year the district participates with other landowners and agencies in the Lower Umpqua Tree Planting Day, which gives local school children an opportunity to plant trees. District personnel also assist with South Slough's Natural Resource Days each spring in helping school children learn basic forest measurements and outdoor skills.

# Administration

It is anticipated that there will be about 11 Full-Time-Equivalent positions **(FTE's)** at the Coos District whose responsibility is to implement current and past Annual Operations Plans. The Coos District is organized into four primary teams:

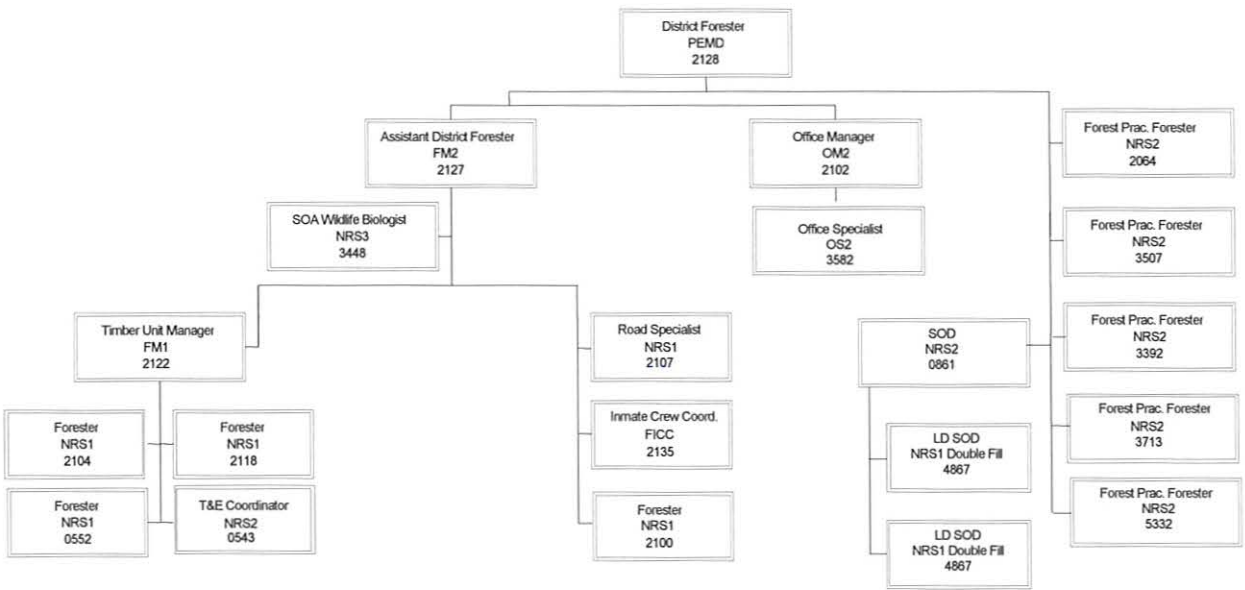
The Administrative Staff which includes the District Forester, Assistant District Forester, Office Manager, and the Southern Oregon Area Wildlife Biologist.

The Reforestation Team is composed of a Natural Resource Specialist and Forest Inmate Crew Coordinator (FICC). This team handles all noncommercial silvicultural treatments from site preparation through pre-commercial thinning.

The Resource Team (a.k.a. Timber Team) is composed of a supervisor and four Natural Resource Specialists. This team prepares Pre-Operations plans for timber sales, timber sale contracts, and administers timber sale contracts. They also are heavily involved in long-range planning and threatened/endangered species monitoring and surveying.

The Road Specialist prepares engineering plans and exhibits for contracts and administers road building/improvement and the road maintenance contract.

Many of the above personnel are involved in wildland firefighting activities during project fire situations throughout the state which can be a very significant workload in addition to normal duties. The Coos District staffing levels are in compliance with current budget instructions. See the organization chart below.



# APPENDIXES

## A. Forest Land Management Classification Changes

This appendix describes (minor/major) changes to the State Forests' Forest Land Management Classification maps, including maps of the specific changes.

## B. Summary Tables

4. Harvest Operations – Financial Summary
5. Harvest Operations – Forest Resource Summary
6. Forest Road Management Summary
7. Reforestation and Young Stand Management Summary
8. Recreation Management Summary

## C. Maps

4. Harvest Operations Vicinity Map
5. Include other maps that support the AOP

## D. Consultations with Other State Agencies

This appendix summarizes the results of consultations with the Oregon Department of Fish and Wildlife and other agencies, as appropriate. This appendix contains any written comments that we received from state agencies.

## E. Public Involvement

This appendix describes the results of the public involvement process of this AOP and will be added prior to its approval.

## F. Pre-Operations Reports

Pre-Operations Reports are available from the district upon request.

Oregon
John A. Kitzhaber, MD, Governor

Department of Forestry
State Forester's Office
2600 State Street
Salem, OR 97310-1336
503-945-7200
FAX 503-945-7212
www.oregon.gov/ODF

"STEWARDSHIP IN FORESTRY"

To: Liz Dent, State Forest Division Chief

From: Doug Decker, State Forester

Date: June 25, 2014

Subject: Implementation of the Revised Forest Land Management Classification Rule on State Forests

This memo addresses approval of the implementation of the revised Forest Land Management Classification System (FLMCS) rule, including the new High Value Conservation Areas and Special Use classifications, on State Forest lands managed by the following districts: Astoria, Coos, Forest Grove, North Cascade, Southwest Oregon, Tillamook, West Oregon, and Western Lane.

On June 5, 2013, the Oregon Board of Forestry adopted a revision to the FLMCS rule (OAR 629-035-0055) that added the classifications of High Value Conservation Area and Special Use while removing the Special Stewardship Classification. The purpose of this rule revision was to increase the visibility of the important conservation strategies that were already occurring on State Forests.

It was clear that implementation of this rule revision would result in a major change to the FLMCS maps/data and would be required to be available for public comment for 30-days (OAR 629-035-0060). Upon approval of the rule revision, the districts were directed to begin the task of updating the FLMCS data with the goal of having draft maps available for a public comment process that would occur concurrently with the normal 45-day public comment period for the Annual Operations Plans.

The public comment period occurred between March 17 and May 2, 2014 and included three open houses that focused on the implementation of the revised FLMCS rules, especially the location and purpose of High Value Conservation Areas. The open house were held early in the public comment period at the Forest Grove, Astoria, and Tillamook district offices. In response to the public comment period, the Division received:

- Eight letters/emails
- Approximately 1,700 form letter type emails
- Fifteen comments generated through an on-line survey

Almost all of the comments were generally supportive of the implementation of the FLMCS. Many of the comments included a request that the Department improve the durability of the High Value Conservation Areas; this issue is currently being addressed through the Alternative Forest Management Plan Project.

Several individuals indicated that old growth should be classified as High Value Conservation Areas. After reviewing the management strategies for old growth in the Northwest Oregon, Southwest Oregon, and Elliott State Forest Management Plans, I have found that old growth stands (as defined in those plans) qualifies for classification as High Value Conservation Areas under the Unique, Threatened, or Endangered Plants subclass. I have directed the districts to include existing old growth stands as High Value Conservation Areas in their final FLMCS designations.

After reviewing the draft FLMC maps/data, the public input, the recommendations from the District Foresters and Area Directors, and consistent with OAR 629-035-0060 (2), I am approving the revised FLMCS for Astoria, Coos, Forest Grove, North Cascade, Southwest Oregon, Tillamook, West Oregon, and Western Lane Districts.

Doug Decker
State Forester

6.25.14
Date

## Appendix A - Changes to Forest Land Management Classification

This Appendix describes changes to the Coos District Forest Land Management Classification (FLMC). These changes meet the definition of a major modification. A major modification is defined as one that cumulatively exceeds 500 acres within one year. Major modifications require a 30 day public comment period which was held in conjunction with the Districts 2015 AOP comment period.

The district has prepared a major change to the FLMC Maps in order to incorporate the changes in the FLMC Administrative Rule (OAR 629-035-0055) approved by the Board of Forestry on June 5, 2013. This change to the FLMC Rule replaced the Special Stewardship with two other classifications (High Value Conservation Areas and Special Use Areas) and made changes to the definitions of the subclasses.

The following points are changes made in addition to those required by the rule change.

- The previous omission of multiple owl cores and the addition of two new owl circles increased the mapped wildlife habitat by 2041 acres.
- The previous omission of the visual area along Highway 101 near the Winchester Bay tract resulted in 9 additional mapped visual acres.
- The previous omission of multiple progeny sites, current vegetation permanent plots and stand management cooperative permanent plots increased the mapped research/monitoring area by 41 acres.
- Multiple old growth stands were mis-identified as wildlife habitat, increasing the mapped plant area by 177 acres.
- The previous omission of multiple domestic water source points and drinking water source areas increased the mapped domestic water use area by 785 acres.
- The previous omission of multiple cultural resource points increased the mapped cultural resource area by 23 acres.
- The previous omission of multiple unclassified streams increased the mapped aquatic and riparian habitat area by 9,459 acres.

Tables 1. 2, and 3, originating in the District Implementation Plan have been updated to reflect these changes. Table 3 illustrates where the change in acres occurred. The number with the strikethrough is the acreage prior to this modification. As defined in OAR 629-035-0060, major modifications require State Forester approval

Updated FLMC maps are also included in this Appendix.

**Table 1. Coos District Acres, by County and Ownership**

| County | BOFLs | CSFLs | Total Acres |
|---|---|---|---|
| Coos | 7,159 | 51,999 | 59,158 |
| Douglas | 1,718 | 31,902 | 33,620 |
| Curry | 0 | 746 | 746 |
| Total Acres | 8,877 | 84,647 | 93,524 |

**Table 2. Coos District Acres, by Stewardship Class and Fund**

| Classification | BOFLs | CSFLs | Total Acres |
|---|---|---|---|
| General Stewardship | ~~1,551~~ 1,295 | ~~16,648~~ 13,511 | ~~18,199~~ 14,806 |
| Focused Stewardship | ~~2,168~~ 5,314 | ~~49,641~~ 51,150 | ~~34,406~~ 56,464 |
| ~~Special Stewardship~~ | ~~5,158~~ | ~~19,809~~ | ~~24,967~~ |
| Special Use | 475 | 2,080 | 2,555 |
| High Value Conservation Area | 1,793 | 17,906 | 19,699 |
| Total Acres | 8,877 | 84,647 | 93,524 |

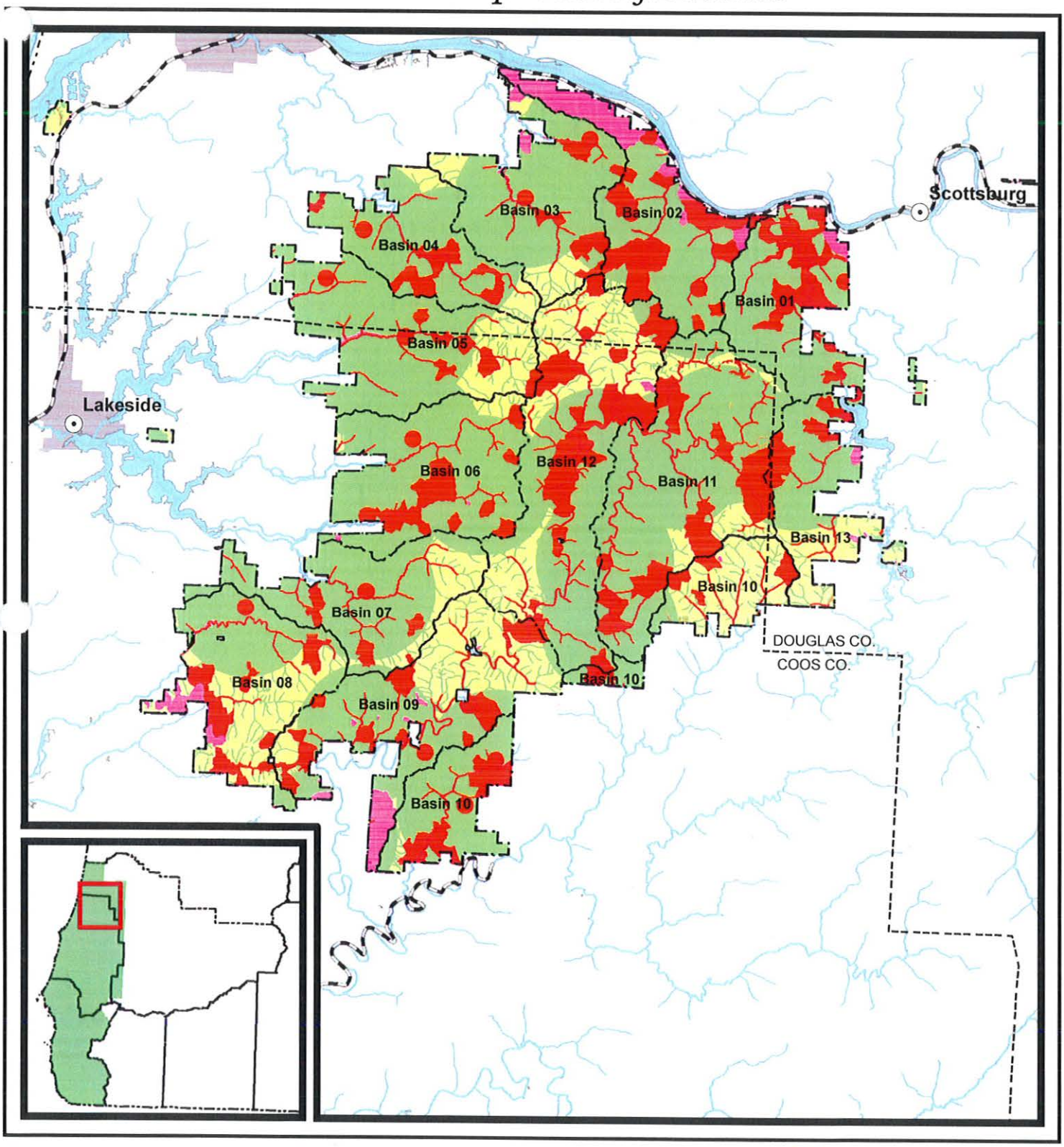
There is no overlap between stewardship classes.

**Table 3. Coos District Acres, Focused Stewardship, Special Use and High Value Conservation Area Subclasses**

| Subclass | Focused Stewardship | ~~Special Stewardship~~ | Special Use | High Value Conservation Area |
|---|---|---|---|---|
| Administrative Sites | - | - | - | - |
| Agriculture, Grazing or Wildlife Forage | ~~99~~ - | - | 99 | - |
| Aquatic and Riparian Habitat | ~~7,026~~ 17,424 | ~~6,249~~ | - | 5,018 |
| County or Local Comprehensive Plans | - | - | - | - |
| Cultural Resources | ~~1~~ 22 | - | 1 | - |
| Deeds | - | - | - | - |
| Domestic Water Use | ~~21~~ 806 | - | - | - |
| Easements | - | ~~3~~ | 3 | - |
| Energy and Minerals | - | - | - | - |
| Operationally Limited | - | ~~2,988~~ | 2,980 | - |
| Plants | 45 | ~~477~~ | - | - |
| Recreation | ~~5~~ - | - | 5 | - |
| Research/Monitoring | ~~57~~ 39 | - | 57 | - |
| Transmission | - | ~~11~~ | 11 | - |
| Unique, Threatened or Endangered Plants | - | - | - | 609 |
| Visual | 2,492 | ~~68~~ | 77 | - |
| Wildlife Habitat | ~~68,897~~ 69,235 | ~~14,369~~ | - | 15,498 |
| Total Acres | ~~78,598~~ 90,062 | ~~24,165~~ | ~~24,165~~ 3,233 | ~~0~~ 21,125 |

There is no overlap within a subclass of a stewardship class.

# Coos District
## Stewardship Classifications




ewardship Classification
- Focused
- HVCA
- Special

- Towns
- Adjacent Districts
- Management Basins

N

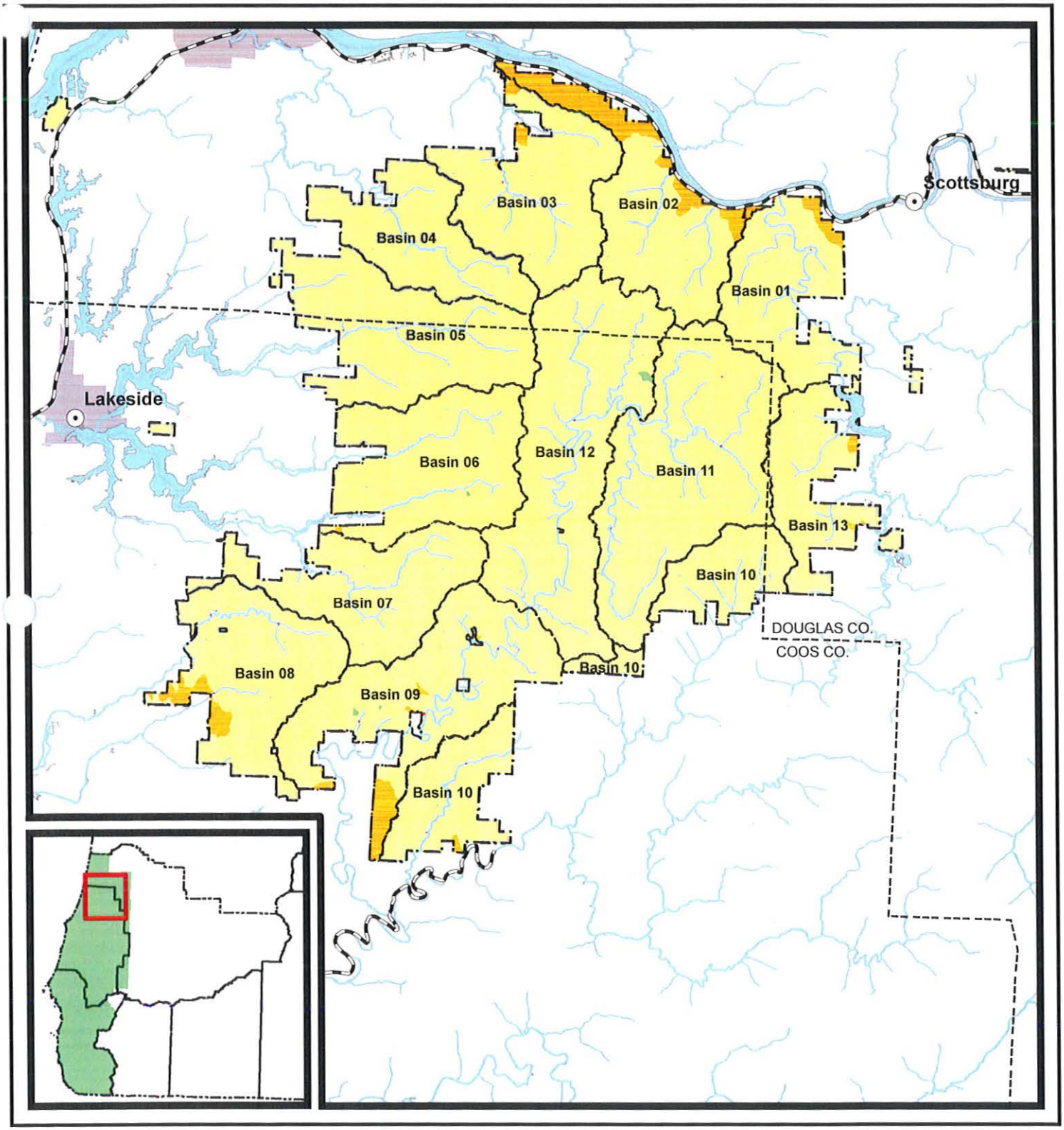
0 1 2 3 4 5
Miles

OREGON DEPARTMENT OF FORESTRY

This product is for informational purposes, and may not be suitable for legal, engineering or surveying purposes.This information or data is provided with the understanding that conclusions drawn from such information are the responsibility of the user.

DMS 06/27/2014

# Coos District
## Stewardship Classifications - Management Subclasses




**Special Use**
- Cultural Resources
- Easements
- Operationally Limited - LPS
- Research/Monitoring

**Focused Stewardship**
- Cultural Resources
- Research/Monitoring

- Towns
- Adjacent Districts
- Management Basins

N

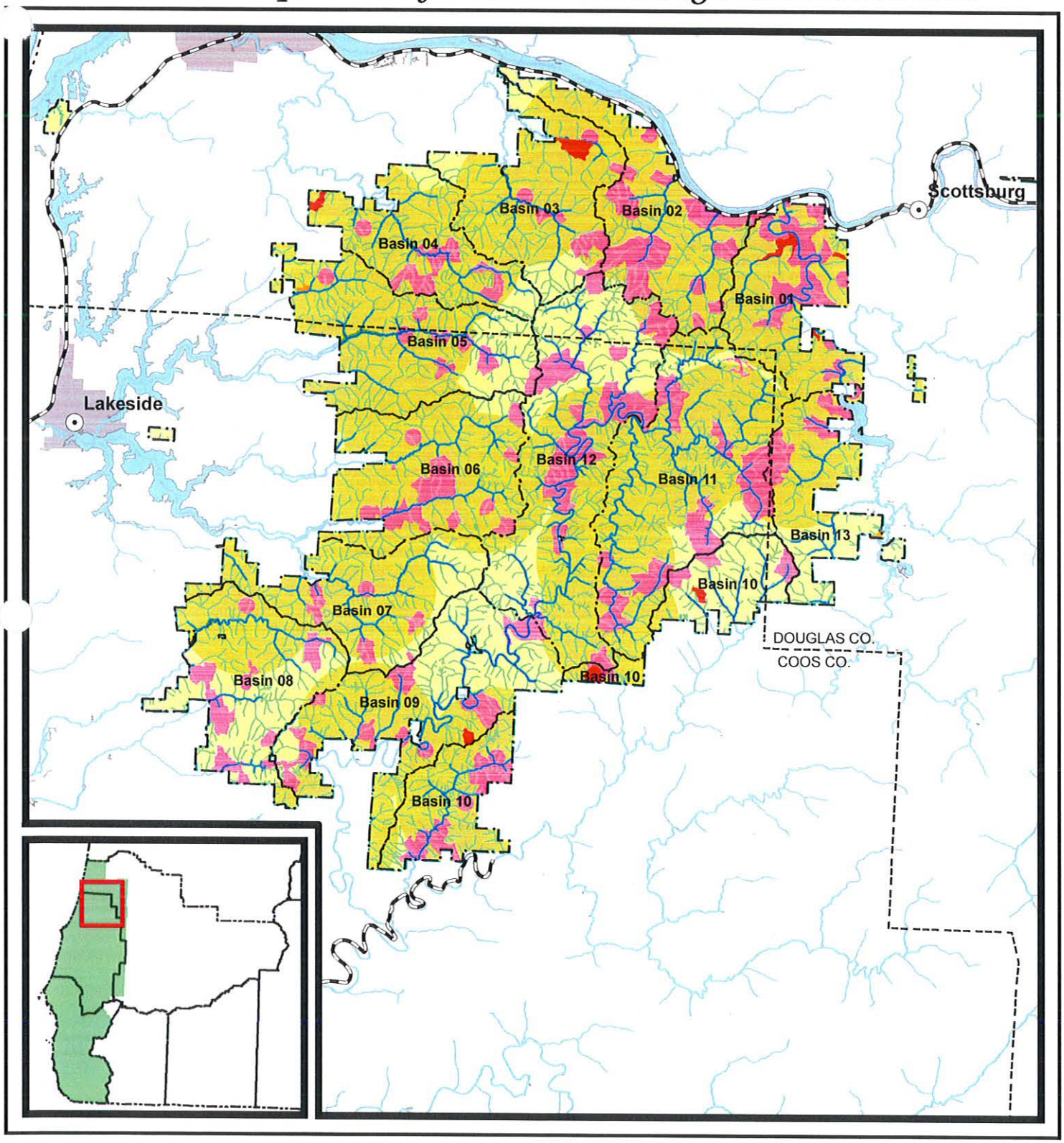
0 1 2 3 4 5
Miles

OREGON DEPARTMENT OF FORESTRY

This product is for informational purposes, and may not be suitable for legal, engineering or surveying purposes. This information or data is provided with the understanding that conclusions drawn from such information are the responsibility of the user.

DMS 06/27/2014

# Coos District
## Stewardship Classifications - Biological Subclasses




**High Value Conservation Area**

- Aquatic and Riparian Habitat
- Wildlife Habitat
- Unique, Threatened or Endangered Plants

**Special Use**

- Agriculture, Grazing or Wildlife Forage

**Focused Stewardship**

- Plants
- Aquatic and Riparian
- Wildlife Habitat
- Towns
- Adjacent Districts
- Management Basins

N

0 1 2 3 4 5

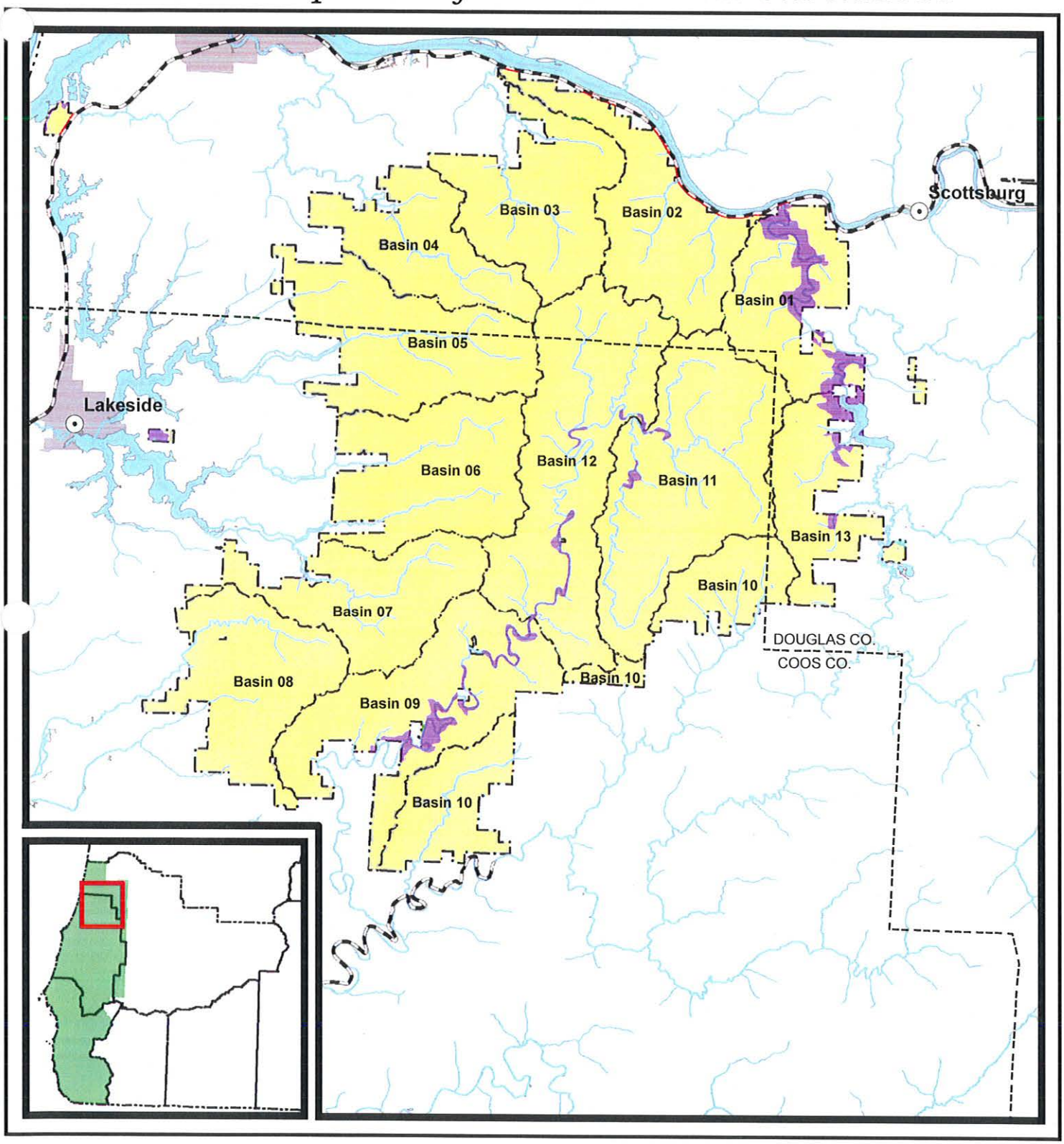
Miles

OREGON DEPARTMENT OF FORESTRY

This product is for informational purposes, and may not be suitable for legal, engineering or surveying purposes.This information or data is provided with the understanding that conclusions drawn from such information are the responsibility of the user.

DMS 06/27/2014

# Coos District
## Stewardship Classifications - Social Subclasses




**Special Use**

- Recreation
- Visual

**Focused Stewardship**

- Domestic Water Use
- Visual

- Towns
- Adjacent Districts
- Management Basins

N

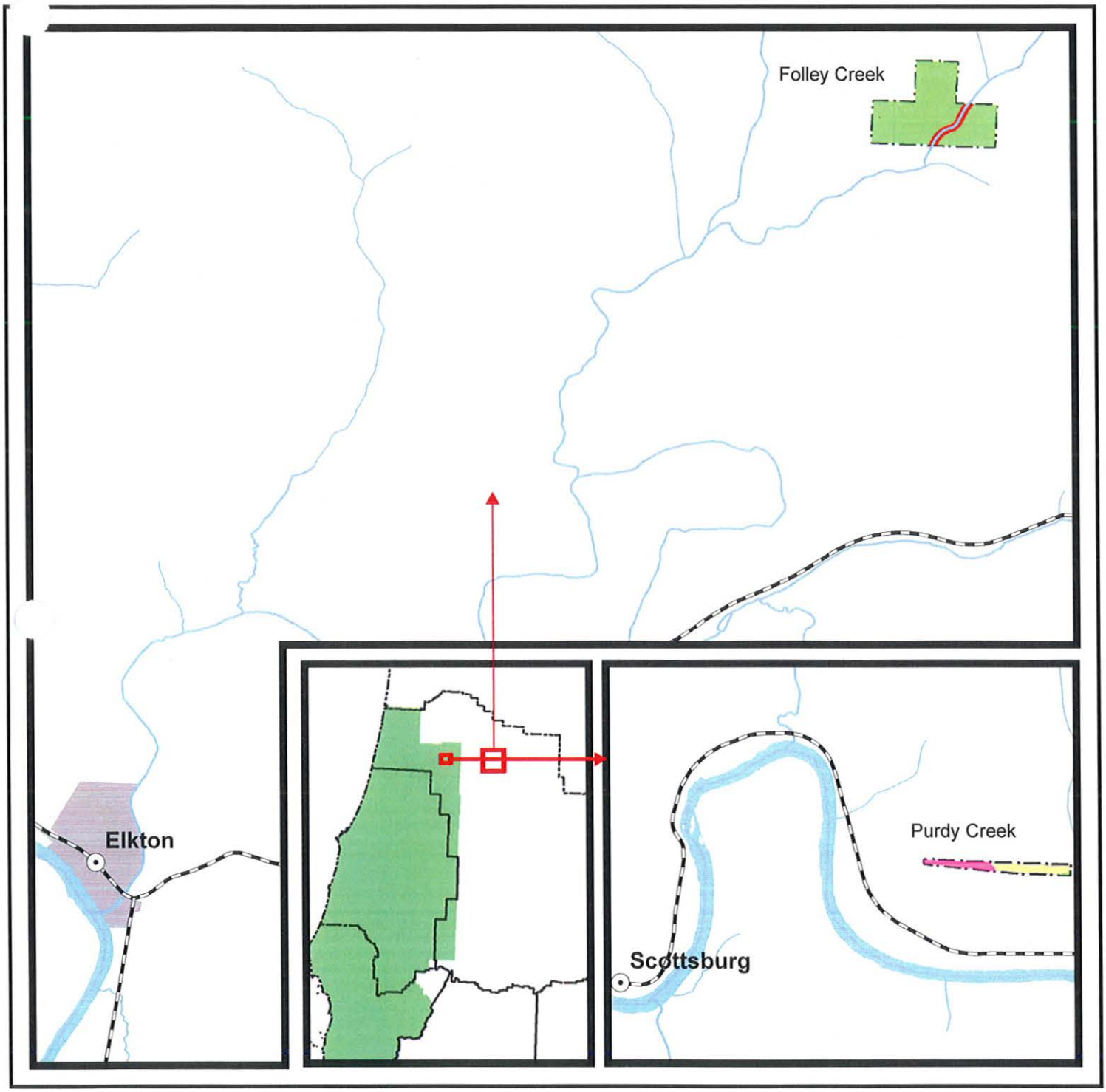
0 1 2 3 4 5

Miles

This product is for informational purposes, and may not be suitable for legal, engineering or surveying purposes.This information or data is provided with the understanding that conclusions drawn from such information are the responsibility of the user.

DMS 06/27/2014

# *Coos District*
## *Stewardship Classifications*




**Stewardship Classification**

- Focused
- HVCA
- Special

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

N

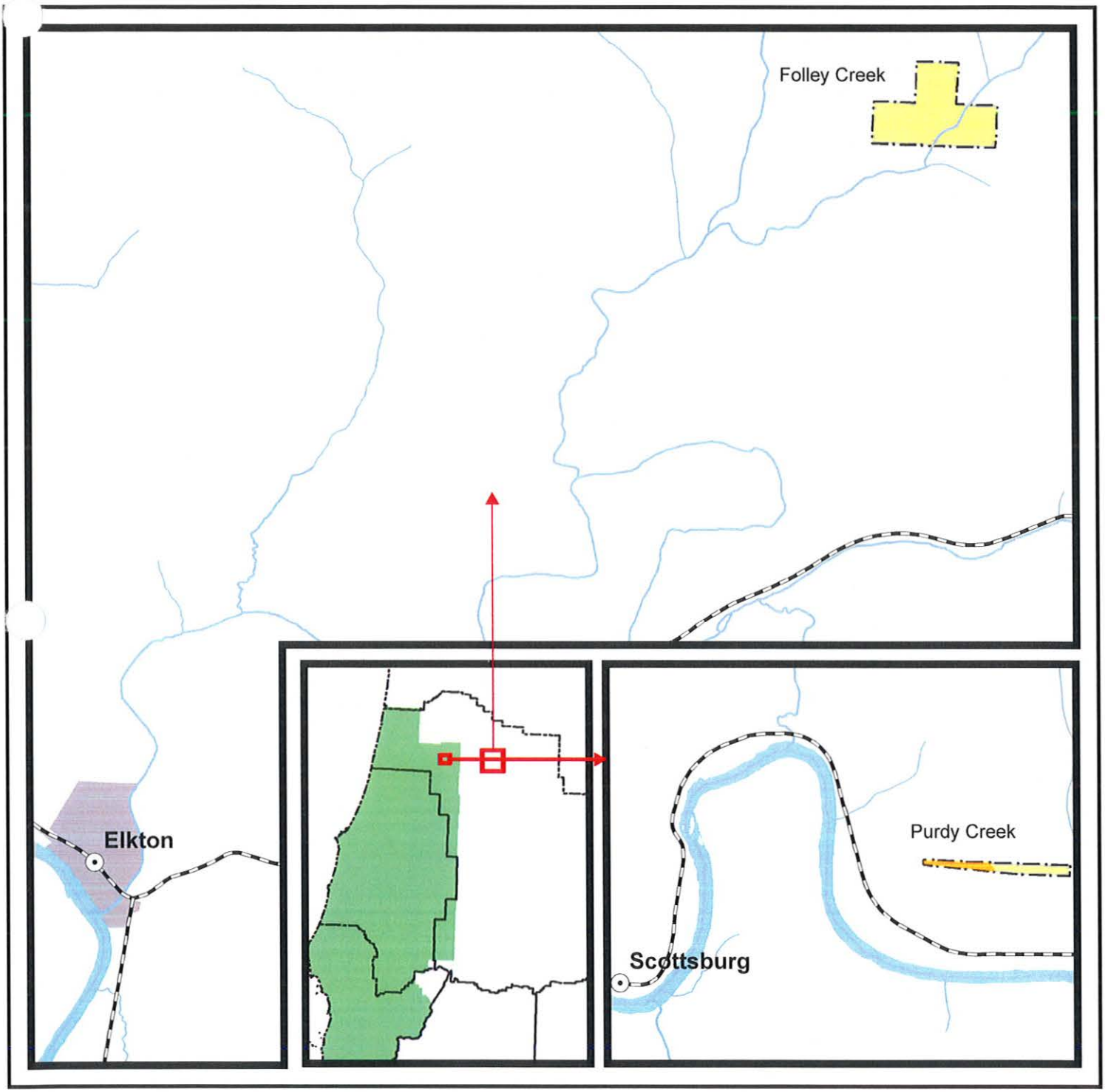
0 0.5 1 1.5 2

Miles

This product is for informational purposes, and may not be suitable for legal, engineering or surveying purposes.This information or data is provided with the understanding that conclusions drawn from such information are the responsibility of the user.

DMS 03/05/2014

# Coos District
## Stewardship Classifications - Management Subclasses




**Focused Stewardship**
- Cultural Resources
- Research/Monitoring

**Special Use**
- Cultural Resources
- Easements
- Operationally Limited - LPS
- Research/Monitoring

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

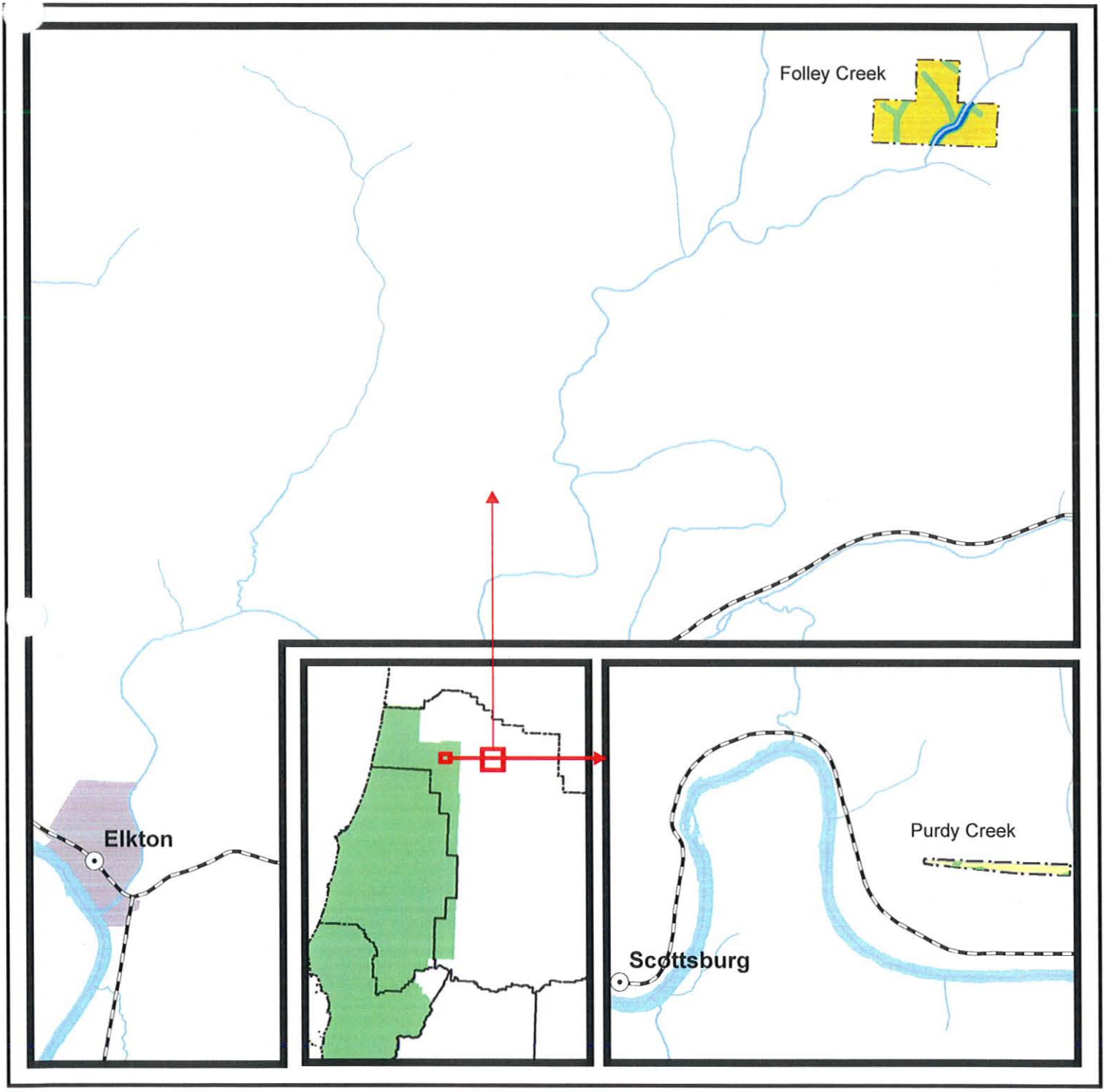
N

0 0.5 1 1.5 2
Miles

This product is for informational purposes, and may not be suitable for legal, engineering or surveying purposes.This information or data is provided with the understanding that conclusions drawn from such information are the responsibility of the user.

DMS 03/05/2014

# Coos District
## Stewardship Classifications - Biological Subclasses




**High Value Conservation Area**

- Aquatic and Riparian Habitat
- Wildlife Habitat

**Focused Stewardship**

- Plants
- Aquatic and Riparian
- Wildlife Habitat

**Special Use**

- Agriculture, Grazing or Wildlife Forage
- Towns
- Streams, Large
- Streams, Medium
- Adjacent Districts
- Management Basins

N

0 0.5 1 1.5 2

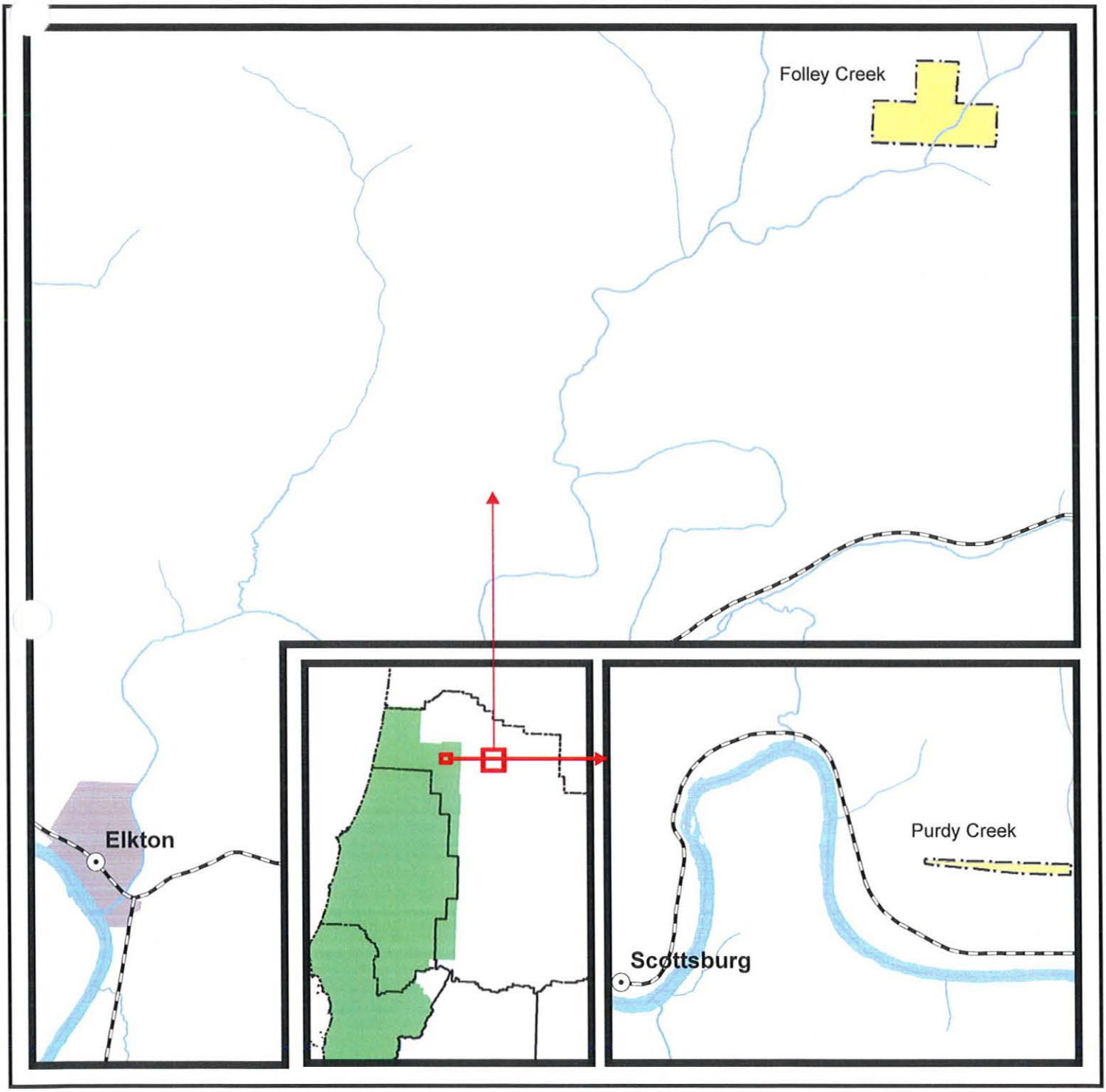
Miles

OREGON DEPARTMENT OF FORESTRY

This product is for informational purposes, and may not be suitable for legal, engineering or surveying purposes. This information or data is provided with the understanding that conclusions drawn from such information are the responsibility of the user.

DMS 03/05/2014

# Coos District
## Stewardship Classifications - Social Subclasses




**Special Use**
- Recreation
- Visual

**Focused Stewardship**
- Domestic Water Use
- Visual

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

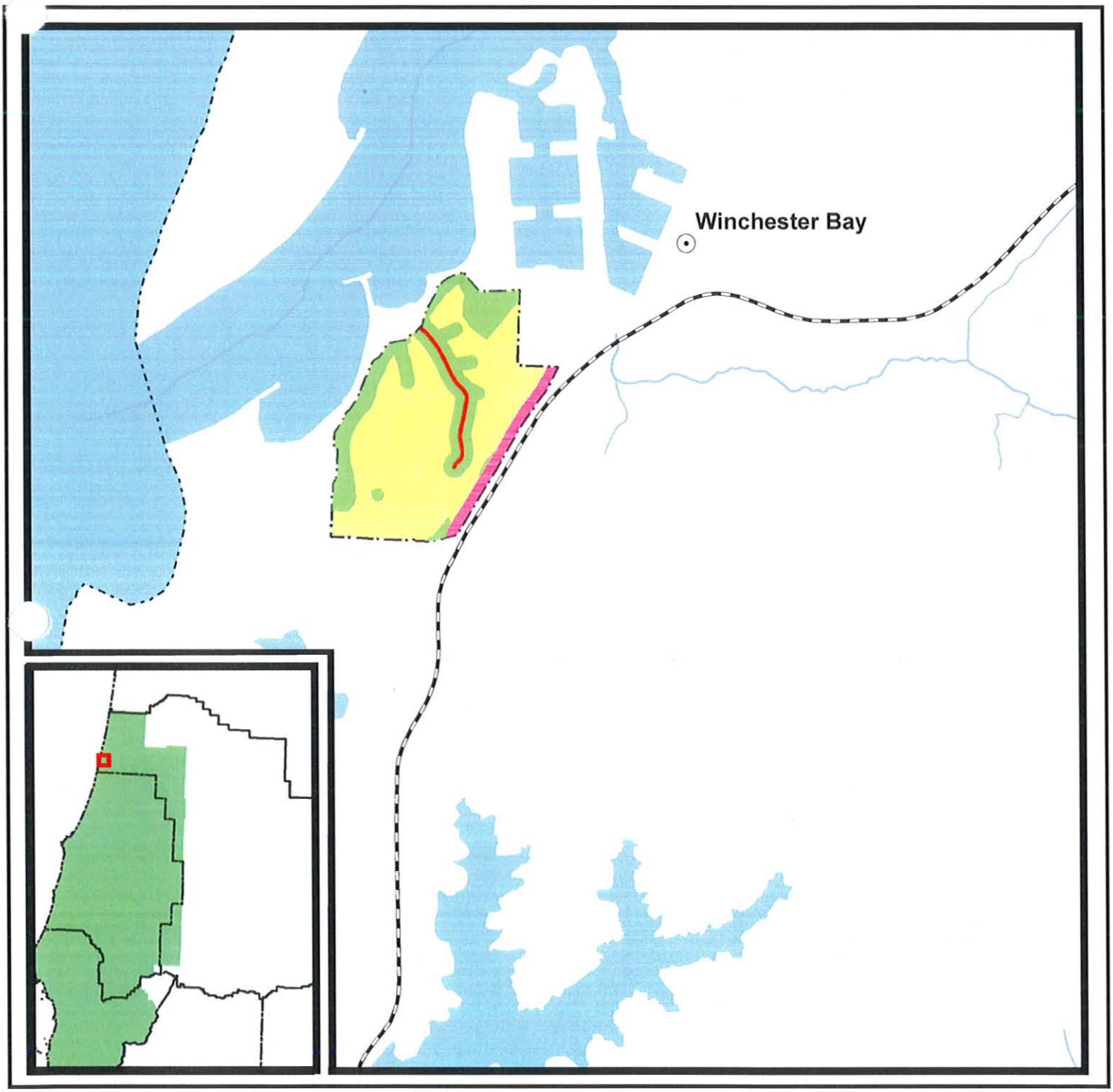
N

0 0.5 1 1.5 2
Miles

This product is for informational purposes, and may not be suitable for legal, engineering or surveying purposes.This information or data is provided with the understanding that conclusions drawn from such information are the responsibility of the user.

DMS 03/05/2014

# *Coos District*
## *Stewardship Classifications*




**Stewardship Classification**

- Focused
- HVCA
- Special

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

N

0 0.15 0.3 0.45 0.6 0.75

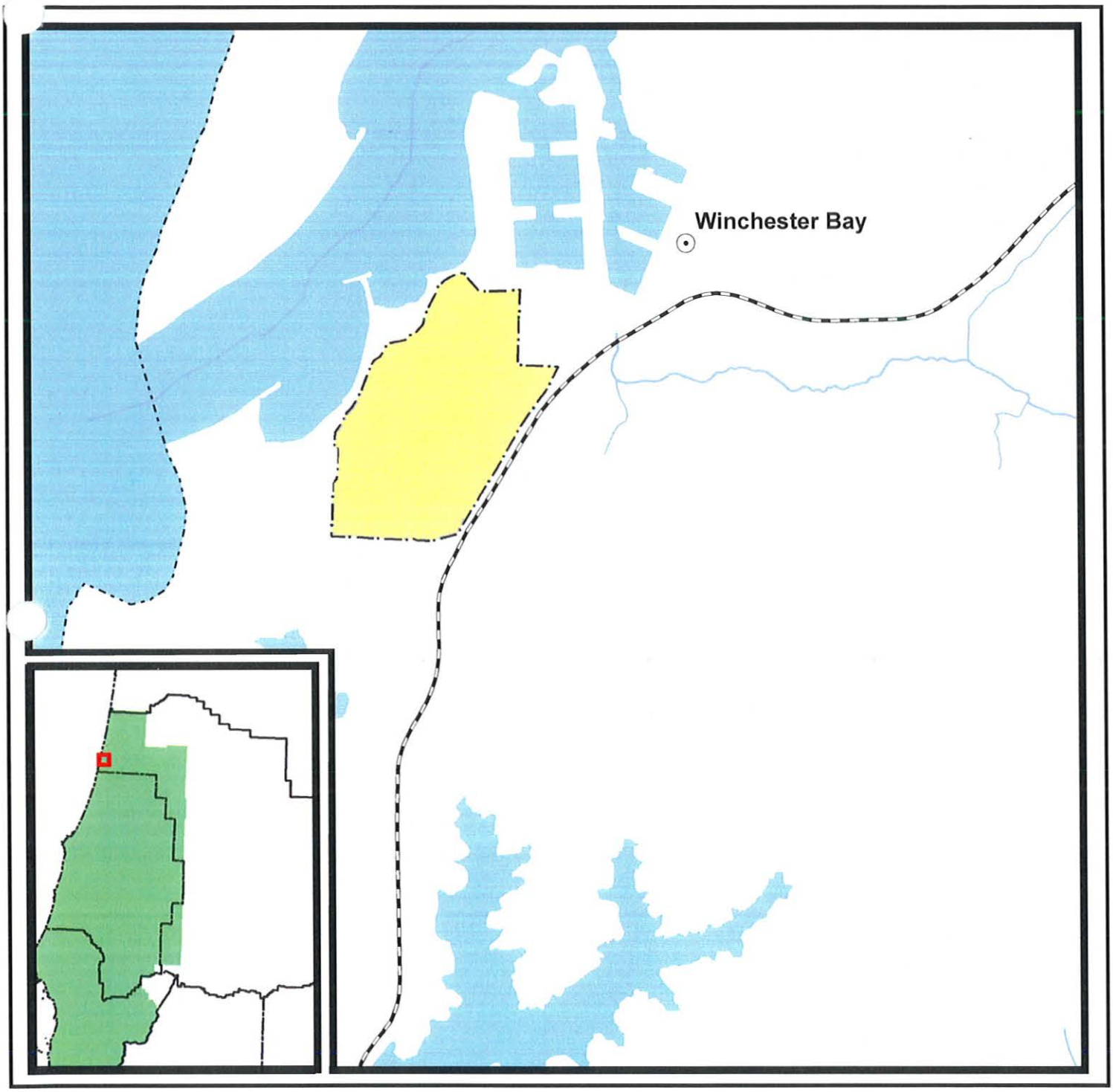
Miles

OREGON DEPARTMENT OF FORESTRY

This product is for informational purposes, and may not be suitable for legal, engineering or surveying purposes.This information or data is provided with the understanding that conclusions drawn from such information are the responsibility of the user.

DMS 03/05/2014

# Coos District
## Stewardship Classifications - Management Subclasses




**Focused Stewardship**

- Cultural Resources
- Research/Monitoring

**Special Use**

- Cultural Resources
- Easements
- Operationally Limited - LPS
- Research/Monitoring

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

N

0 0.15 0.3 0.45 0.6 0.75

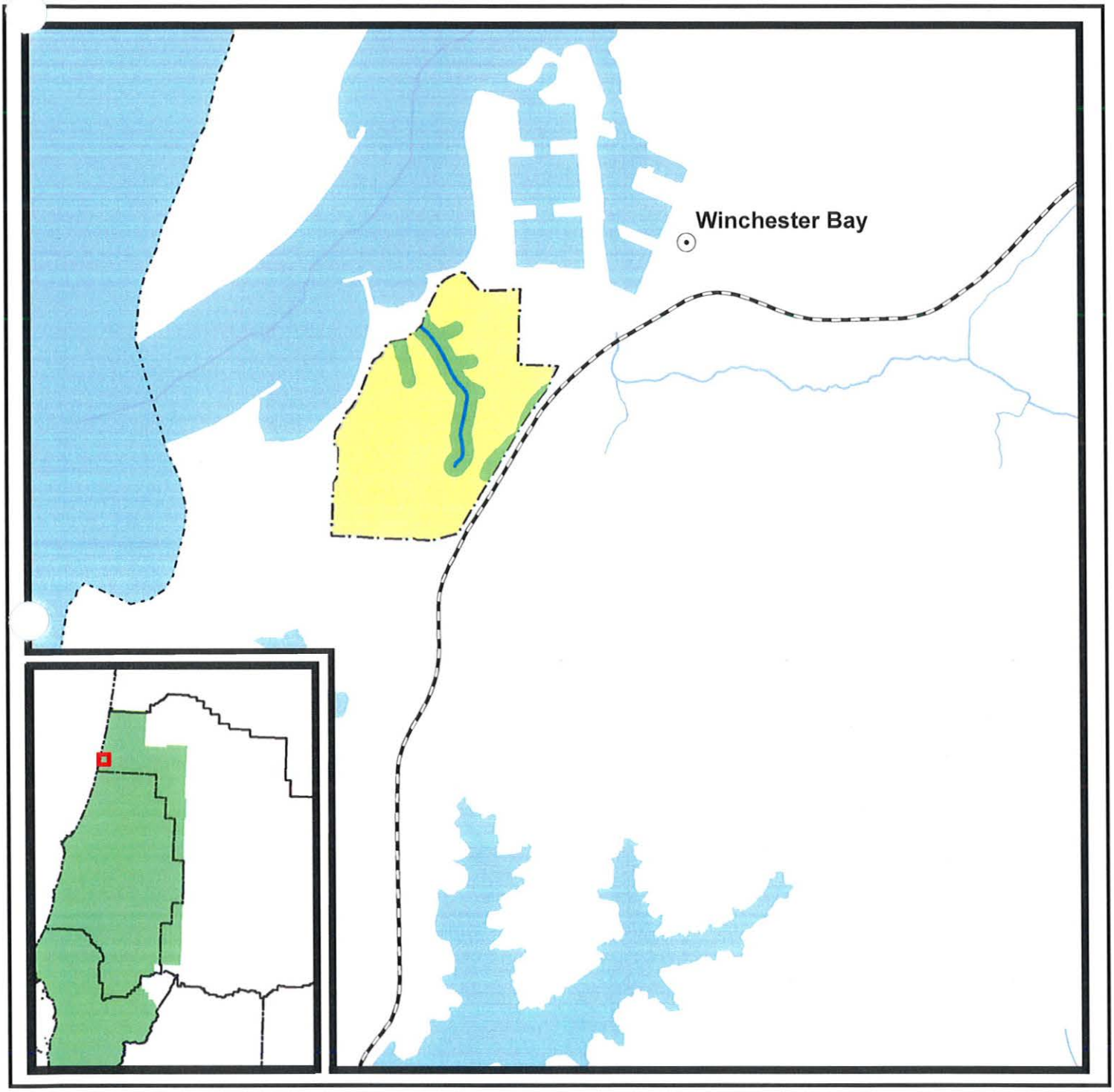
Miles

OREGON DEPARTMENT OF FORESTRY

This product is for informational purposes, and may not be suitable for legal, engineering or surveying purposes. This information or data is provided with the understanding that conclusions drawn from such information are the responsibility of the user.

DMS 03/05/2014

# Coos District
## Stewardship Classifications - Biological Subclasses




**High Value Conservation Area**

- Aquatic and Riparian Habitat
- Wildlife Habitat

**sed Stewardship**

- Plants
- Aquatic and Riparian
- Wildlife Habitat

**Special Use**

- Agriculture, Grazing or Wildlife Forage
- Towns
- Streams, Large
- Streams, Medium
- Adjacent Districts
- Management Basins

N

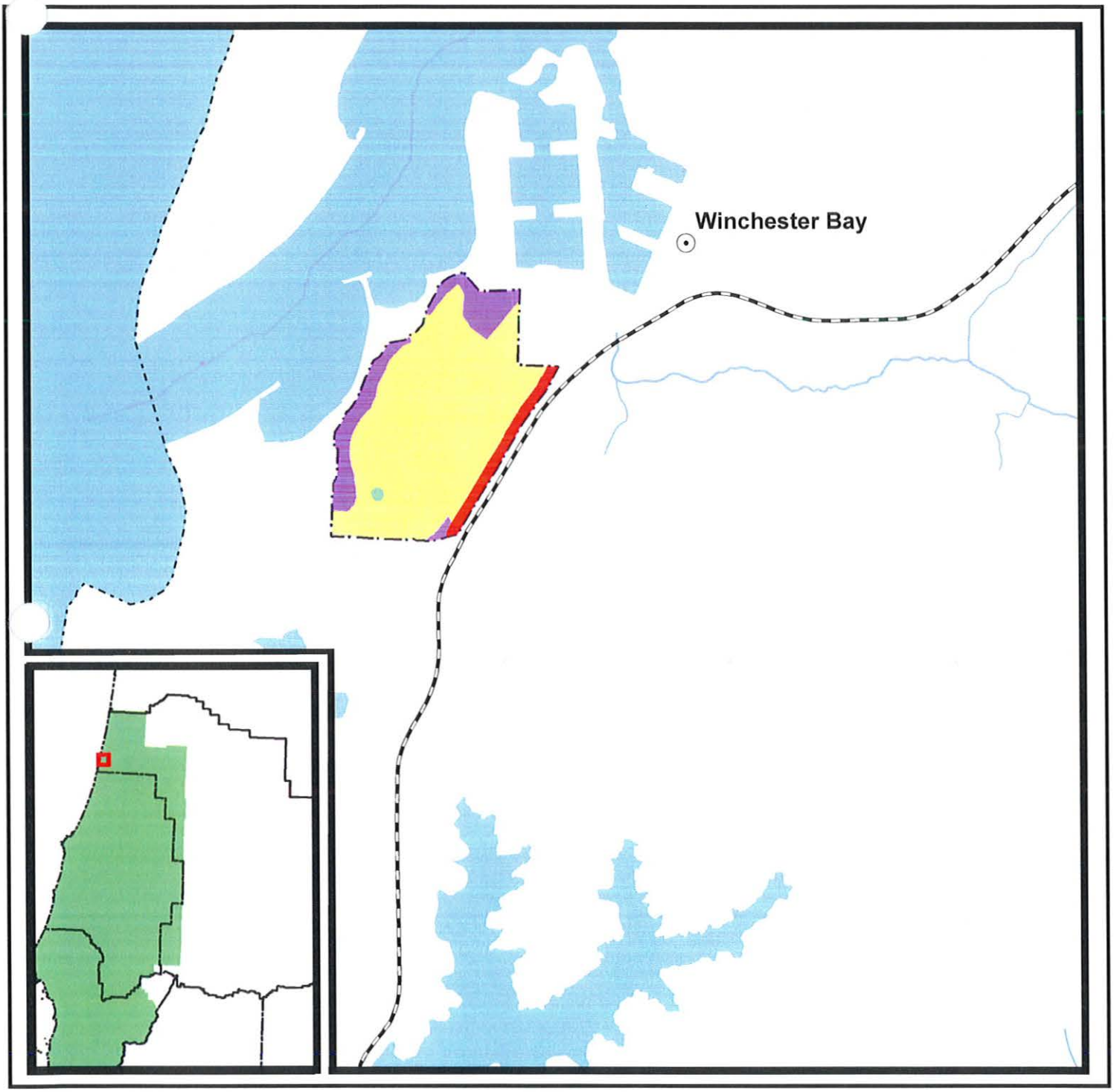
0 0.15 0.3 0.45 0.6 0.75

Miles

This product is for informational purposes, and may not be suitable for legal, engineering or surveying purposes.This information or data is provided with the understanding that conclusions drawn from such information are the responsibility of the user.

DMS 03/05/2014

# Coos District
## Stewardship Classifications - Social Subclasses




**Special Use**

- Recreation
- Visual

**Focused Stewardship**

- Domestic Water Use
- Visual

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

N

0 0.15 0.3 0.45 0.6 0.75

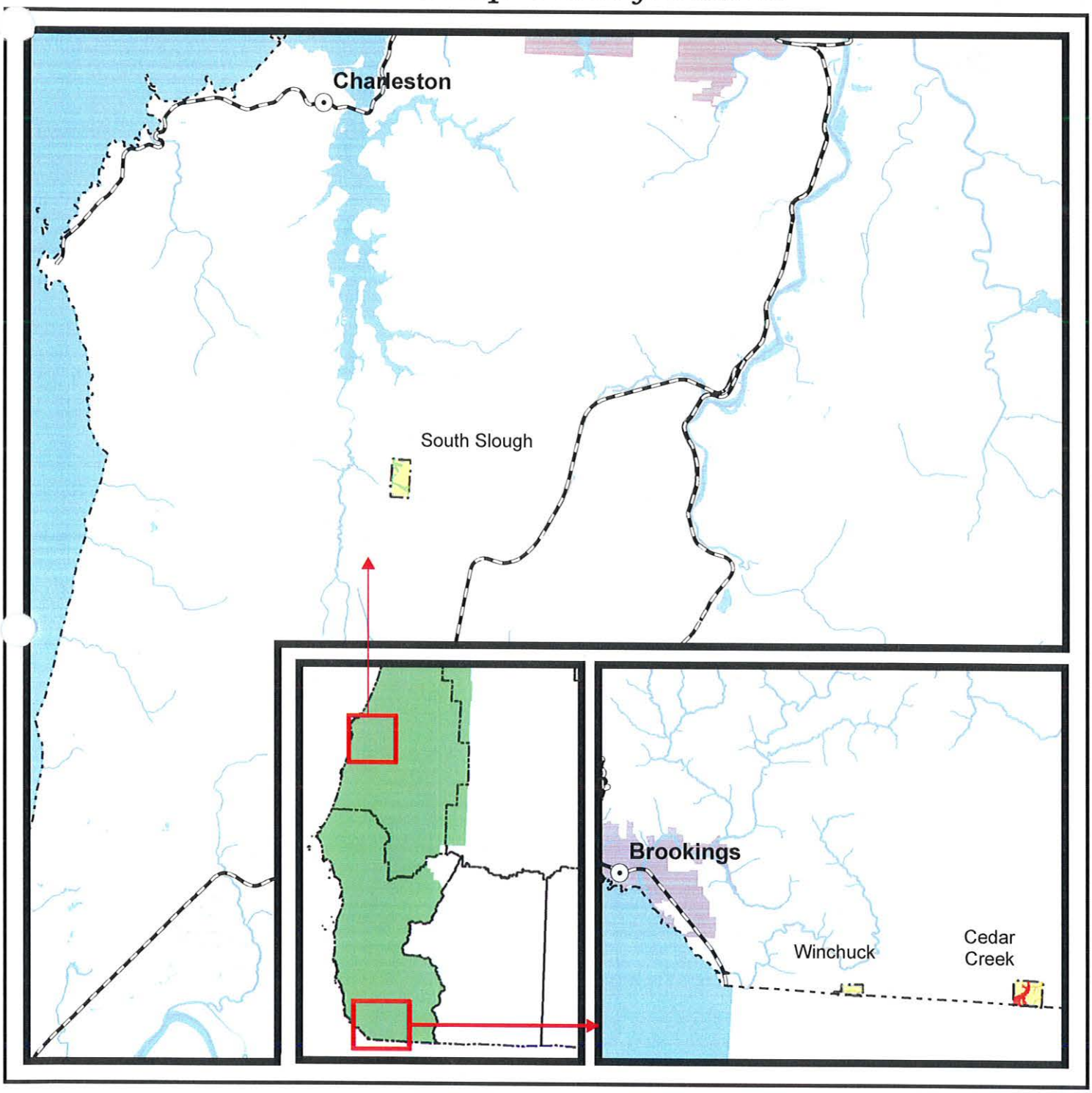
Miles

OREGON DEPARTMENT OF FORESTRY



DMS 03/05/2014

# *Coos District*
# *Stewardship Classifications*




**Stewardship Classification**

- Focused
- HVCA
- Special

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

N

0 2.5 5 7.5 10

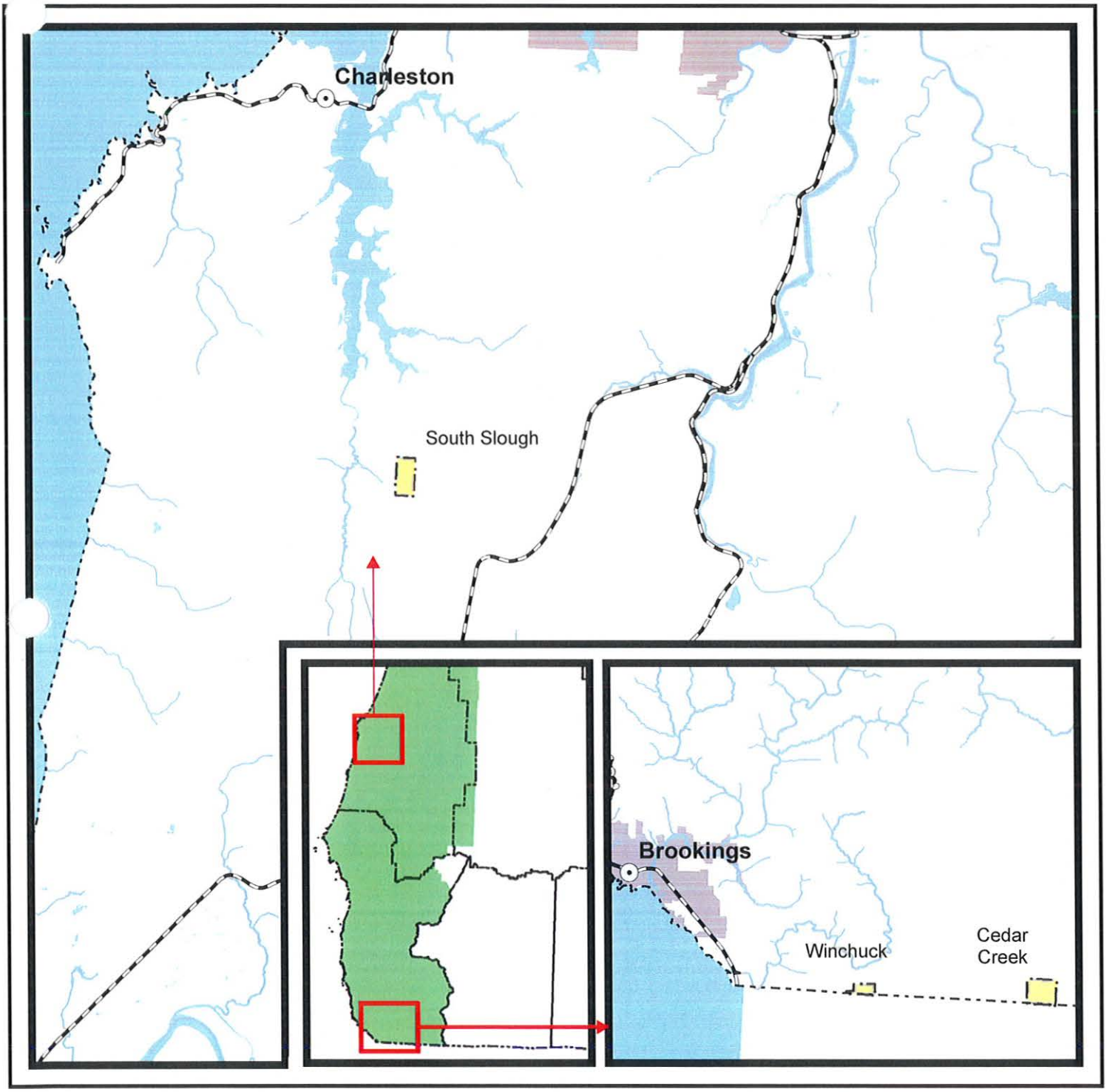
Miles

OREGON DEPARTMENT OF FORESTRY



DMS 06/27/2014

# Coos District
## Stewardship Classifications - Management Subclasses




**Focused Stewardship**

- Cultural Resources
- Research/Monitoring

**Special Use**

- Cultural Resources
- Easements
- Operationally Limited - LPS
- Research/Monitoring

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

N

0 2.5 5 7.5 10

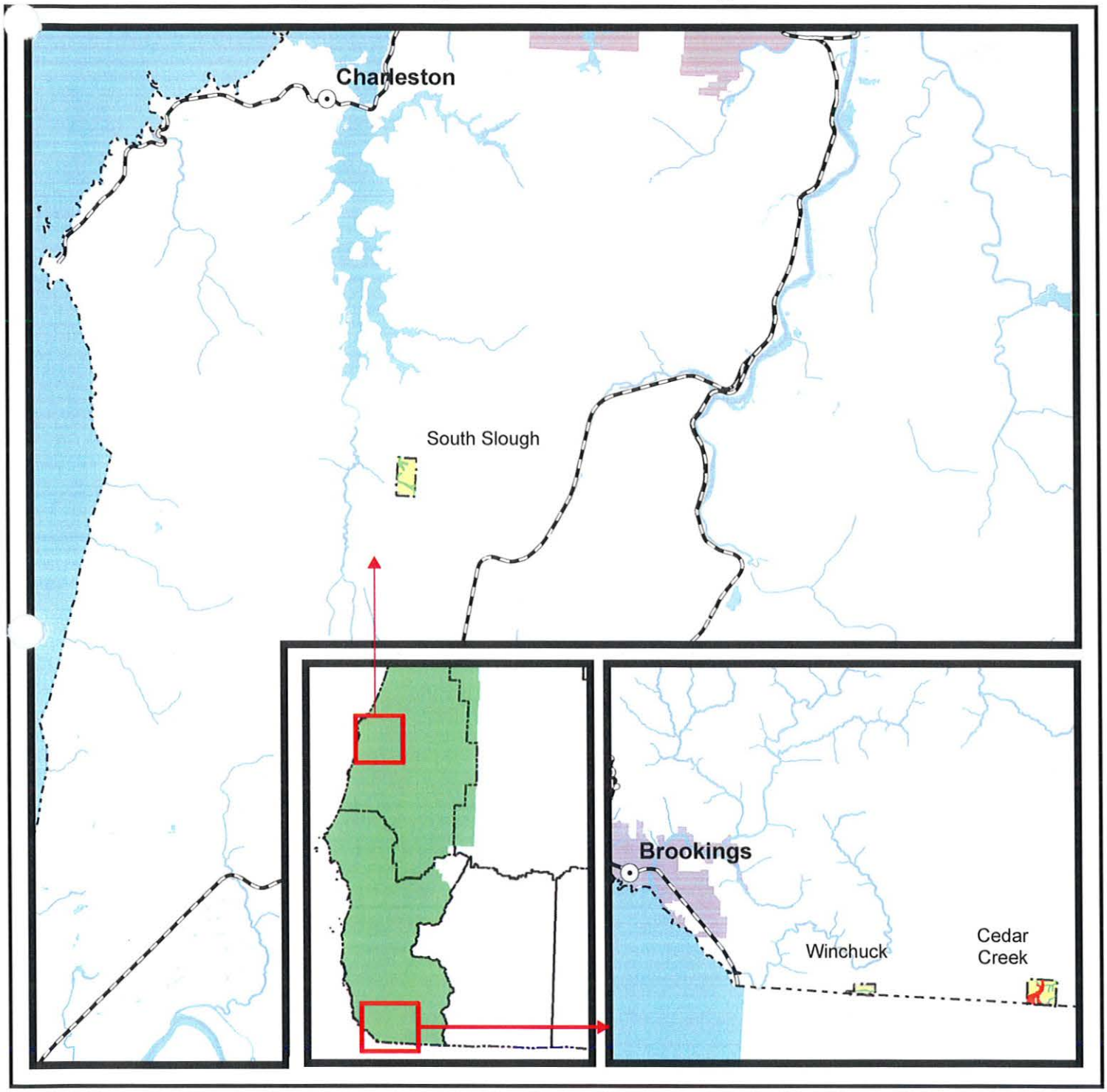
Miles

OREGON DEPARTMENT OF FORESTRY



DMS 03/05/2014

# *Coos District*
## *Stewardship Classifications - Biological Subclasses*




**High Value Conservation Area**

- Aquatic and Riparian Habitat
- Unique, Threatened or Endangered Plants
- Wildlife Habitat

**Special Use**

- Agriculture, Grazing or Wildlife Forage

**Focused Stewardship**

- Plants
- Aquatic and Riparian
- Wildlife Habitat
- Towns
- Adjacent Districts
- Management Basins

N

0 2.5 5 7.5 10

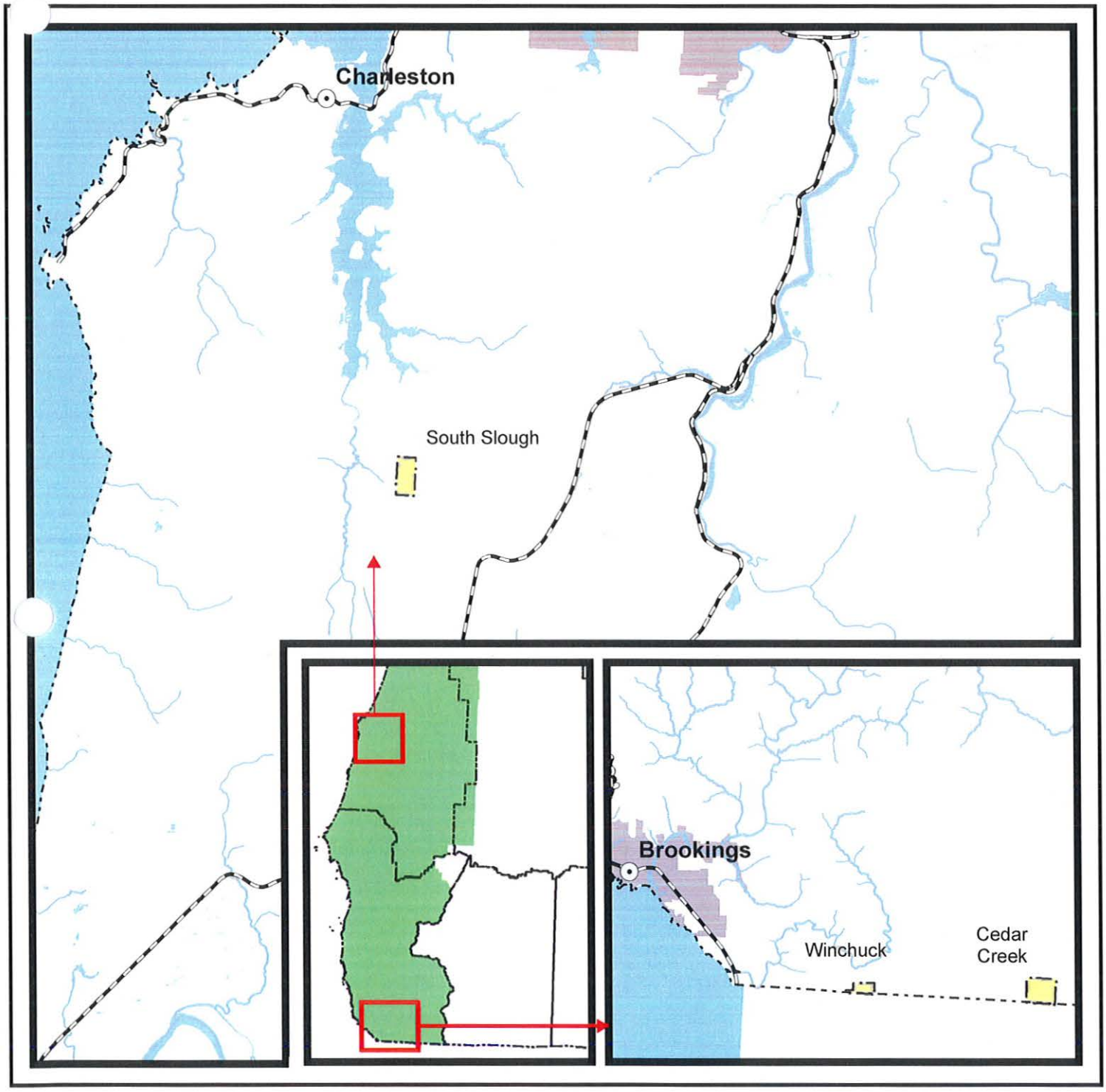
Miles

OREGON DEPARTMENT OF FORESTRY

This product is for informational purposes, and may not be suitable for legal, engineering or surveying purposes. This information or data is provided with the understanding that conclusions drawn from such information are the responsibility of the user.

DMS 06/27/2014

# *Coos District*
## *Stewardship Classifications - Social Subclasses*




**Special Use**
- Recreation
- Visual

**Focused Stewardship**
- Domestic Water Use
- Visual

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

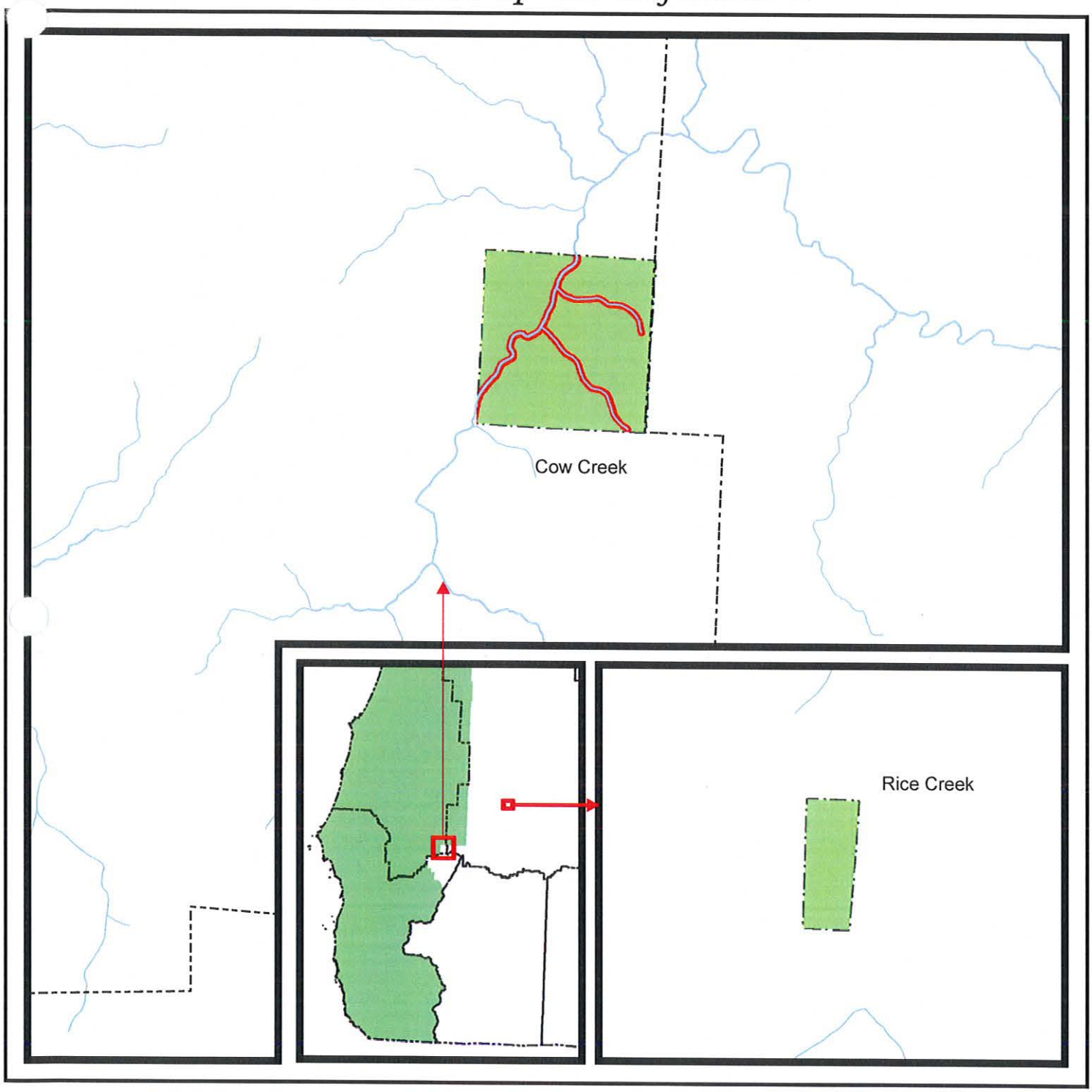
N

0 2.5 5 7.5 10
Miles

This product is for informational purposes, and may not be suitable for legal, engineering or surveying purposes.This information or data is provided with the understanding that conclusions drawn from such information are the responsibility of the user.

DMS 03/05/2014

# *Coos District*
## *Stewardship Classifications*




**Stewardship Classification**

- Focused
- HVCA
- Special

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

N

0 0.5 1 1.5 2

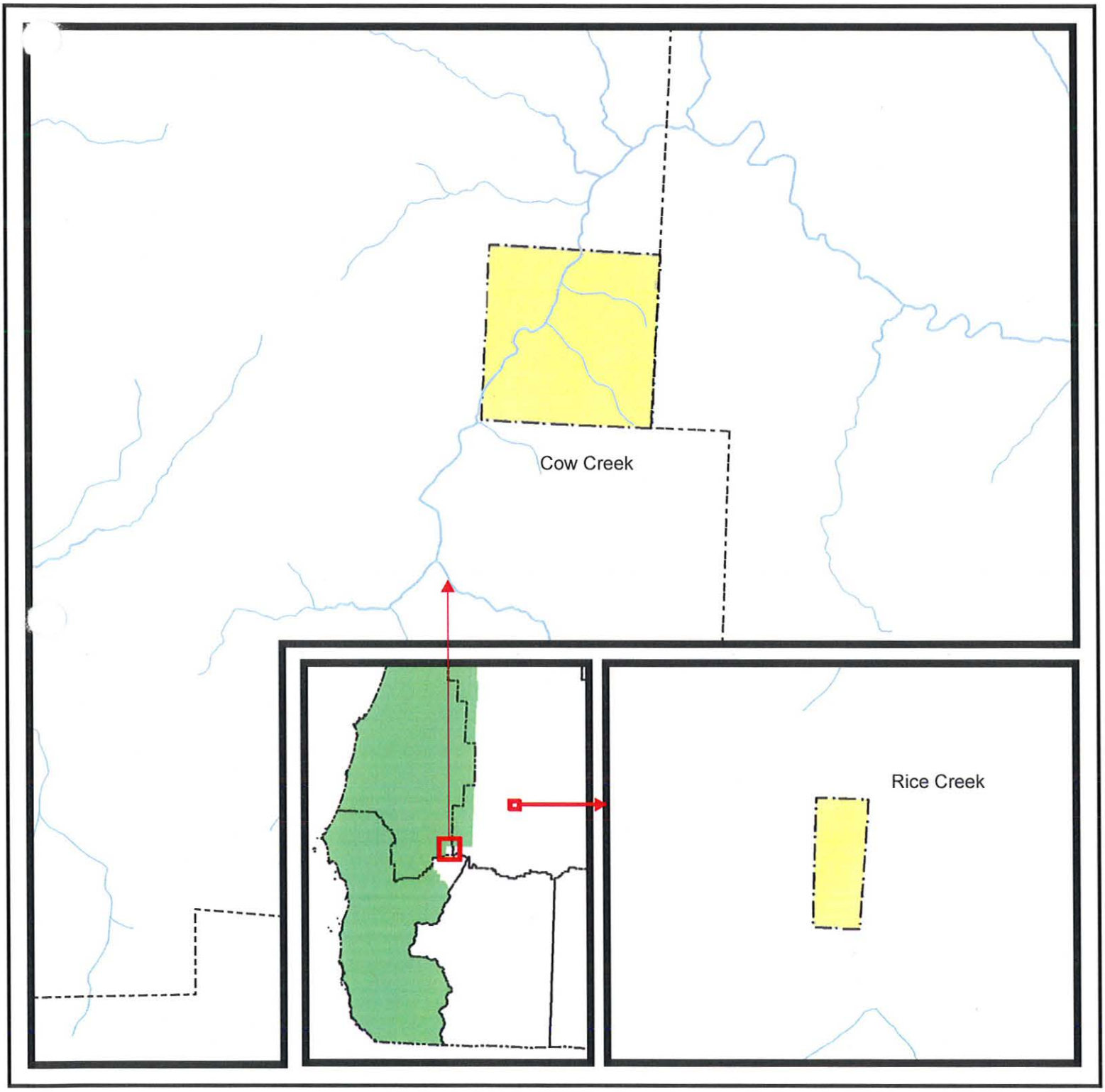
Miles

OREGON DEPARTMENT OF FORESTRY

This product is for informational purposes, and may not be suitable for legal, engineering or surveying purposes.This information or data is provided with the understanding that conclusions drawn from such information are the responsibility of the user.

DMS 03/05/2014

# Coos District
## Stewardship Classifications - Management Subclasses




**Special Use**

- Cultural Resources
- Easements
- Operationally Limited - LPS
- Research/Monitoring

**Focused Stewardship**

- Cultural Resources
- Research/Monitoring

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

N

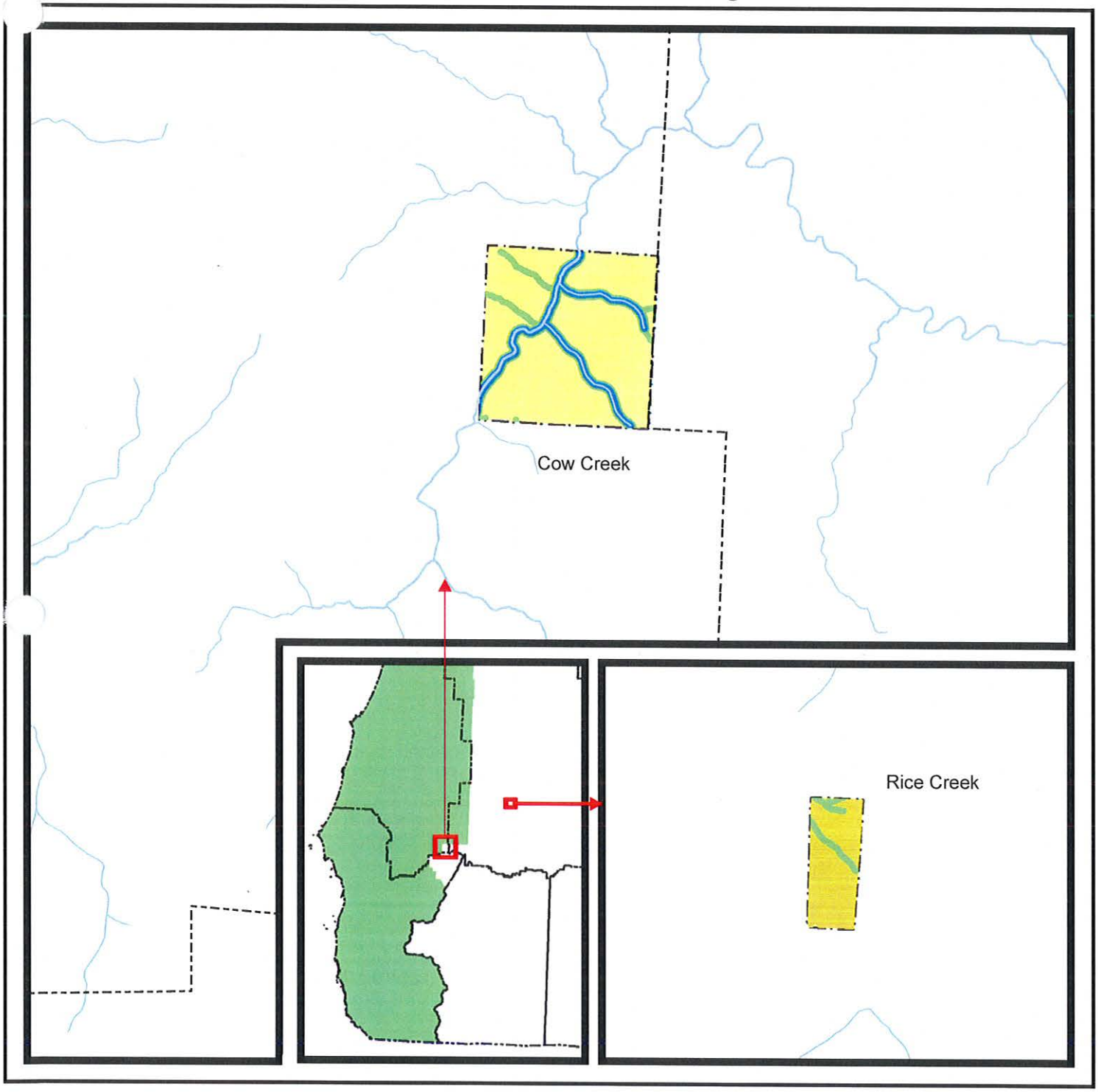
0 0.5 1 1.5 2

Miles

This product is for informational purposes, and may not be suitable for legal, engineering or surveying purposes.This information or data is provided with the understanding that conclusions drawn from such information are the responsibility of the user.

DMS 03/05/2014

# Coos District
## Stewardship Classifications - Biological Subclasses




**High Value Conservation Area**

- Aquatic and Riparian Habitat
- Wildlife Habitat

**sed Stewardship**

- Plants
- Aquatic and Riparian
- Wildlife Habitat

**Special Use**

- Agriculture, Grazing or Wildlife Forage
- Towns
- Streams, Large
- Streams, Medium
- Adjacent Districts
- Management Basins

N

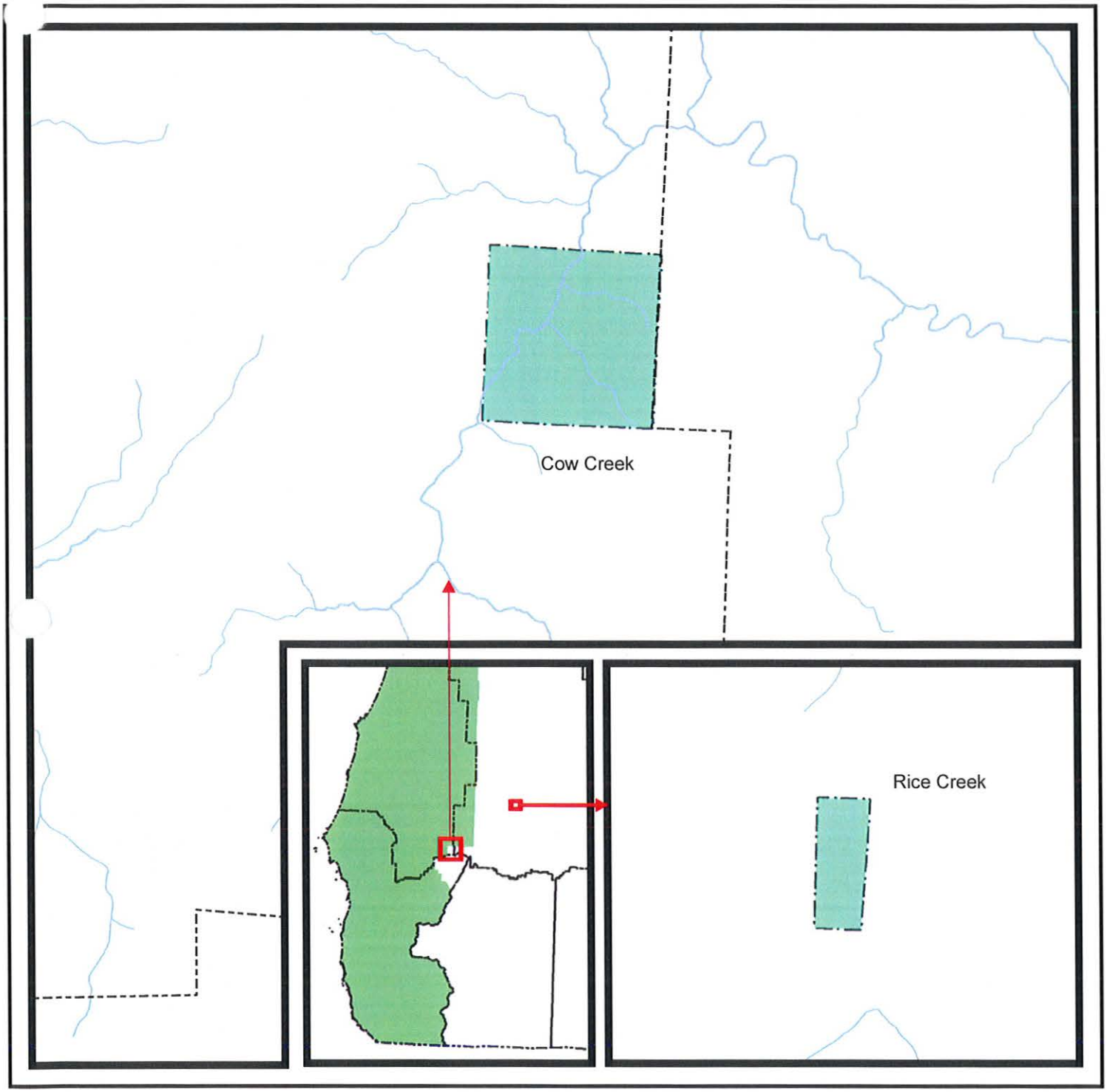
0 0.5 1 1.5 2

Miles

This product is for informational purposes, and may not be suitable for legal, engineering or surveying purposes.This information or data is provided with the understanding that conclusions drawn from such information are the responsibility of the user.

DMS 03/05/2014

# Coos District
## Stewardship Classifications - Social Subclasses




**Special Use**

- Recreation
- Visual

**Focused Stewardship**

- Domestic Water Use
- Visual

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

N

0 0.5 1 1.5 2

Miles

This product is for informational purposes, and may not be suitable for legal, engineering or surveying purposes.This information or data is provided with the understanding that conclusions drawn from such information are the responsibility of the user.

DMS 03/05/2014

B Summary Tables

## Table 4 HARVEST OPERATIONS - FINANCIAL SUMMARY

**District:** Coos **Fiscal Year:** 2015 **Date:** 06/20/2014

| Primary Operation | Fund % | | County | Sale Quarter | Net Acres | | Volume (MMBF) | | | Value | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | BOF | CSL | | | Partial Cut | Clear-cut | Conifer | Hard-woods | Total | Gross | Projects | Net |
| Deer Creek Headwaters | | 100% | Douglas | 1 | | 17 | 0.3 | 0.0 | 0.3 | $99,450 | $5,000 | $94,450 |
| Hakki Headwaters | 100% | | Douglas | 2 | | 79 | 1.2 | 0.1 | 1.3 | $410,800 | $55,000 | $355,800 |
| Lean Dean | 100% | | Douglas | 2 | | 21 | 1.3 | 0.0 | 1.3 | $472,500 | $25,000 | $447,500 |
| Eleven Creek Headwaters | | 100% | Coos | 2 | | 51 | 0.8 | 0.1 | 0.9 | $281,775 | $19,845 | $261,930 |
| Lower West Glenn | | 100% | Coos | 3 | | 111 | 2.1 | 0.0 | 2.1 | $675,025 | $20,000 | $655,025 |
| West Glenn Howell | | 100% | Coos | 3 | | 48 | 0.9 | 0.0 | 0.9 | $280,800 | $25,000 | $255,800 |
| Wilkins Murphy Divide | | 100% | Douglas | 3 | | 63 | 2.5 | 0.1 | 2.6 | $912,450 | $90,000 | $822,450 |
| Salander Ridge | | 100% | Douglas | 4 | | 51 | 1.5 | 0.0 | 1.5 | $481,600 | $50,000 | $431,600 |
| Winchester Creek | | 100% | Coos | 4 | | 65 | 1.9 | 0.2 | 2.1 | $621,600 | $30,000 | $591,600 |
| | | | | **Total:** | **0** | **506** | **12.5** | **0.5** | **13.0** | **4,236,000** | **319,845** | **$3,916,155** |

## Table 5 FOREST RESOURCE SUMMARY

**District:** Coos **Fiscal Year** 2015 **Date:** 06/20/2014

**Forest Resources Present In or Adjacent To Harvest Operations**

| Primary Operation | Area (Optional) | Forest Health Issues Present [1] | Invasive Species Present [2] | Install/Replace Culverts on Streams | Operating within 100' of Fish Bearing or Perennial Stream [5] | Domestic Water Source Present/Adacent | Potential Stream Habitat Improvement | Operating within a NSO Provincial Circle | Within 1/4 mile of MMMA | T&E Fish in Basin | T&E Plants Present/Adjacent | Geotechnical Issues Needing Review | Recreation Sites Present or Adjacent | Cultural Resources Present or Adjacent | Scenic Resources Present or Adjacent |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Deer Creek Headwaters | | N | A | N | PS | N | N | N | N | Y | N | N | N | N | N |
| Hakki Headwaters | | N | A | N | PS | N | N | N | N | Y | N | N | N | N | N |
| Lean Dean | | N | A | N | PS | N | N | Y | N | Y | N | N | N | N | N |
| Eleven Creek Headwaters | | N | A | N | PS | N | N | N | N | Y | N | N | N | N | N |
| Lower West Glenn | | N | A | N | PS | N | N | Y | N | Y | N | N | N | N | N |
| West Glenn Howell | | N | A | N | PS | N | N | N | N | Y | N | N | N | N | N |
| Wilkins Murphy Divide | | N | A | N | PS | N | Y | Y | N | Y | N | N | N | N | N |
| Salander Ridge | | N | A | N | PS | N | N | Y | N | Y | N | Y | N | N | N |
| Winchester Creek | | N | A | N | PS | N | N | N | N | Y | N | N | N | N | N |

[1] A 'Y' (in any column) indicates yes the operation does involve the specified resource

[2] A 'P' indicates that the specificied resource is present within the operations boundaries, while an 'A' indicates that the resource is adjacent to the operation (in any column)

[5] A 'F' for Fish Bearing or a 'PS' for Perennial Stream indicates that the operation may include activity within 100' of this stream type

## Table 6: FOREST ROADS MANAGEMENT SUMMARY

**District:** Coos **Fiscal Year:** 2015 **Date:** 06/20/2014

| Primary Operation | Construction | | Improvement | | Other Projects* | Total Project Costs | Gross Value of Operation | Total Cost as a percent of Gross Value |
|---|---|---|---|---|---|---|---|---|
| | Miles | Cost | Miles | Cost | | | | |
| Deer Creek Headwaters | 0.0 | $0 | 0.0 | $0 | $5,000 | $5,000 | $99,450 | **5.0%** |
| Hakki Headwaters | 0.2 | $20,000 | 0.4 | $15,000 | $20,000 | $55,000 | $410,800 | **13.4%** |
| Lean Dean | 0.1 | $10,000 | 0.0 | $0 | $15,000 | $25,000 | $472,500 | **5.3%** |
| Eleven Creek Headwaters | 0.1 | $19,845 | 0.0 | $0 | $0 | $19,845 | $281,775 | **7.0%** |
| Lower West Glenn | 0.0 | $0 | 0.9 | $10,000 | $10,000 | $20,000 | $675,025 | **3.0%** |
| West Glenn Howell | 0.0 | $0 | 1.6 | $15,000 | $10,000 | $25,000 | $280,800 | **8.9%** |
| Wilkins Murphy Divide | 0.2 | $15,000 | 2.6 | $65,000 | $10,000 | $90,000 | $912,450 | **9.9%** |
| Salander Ridge | 0.0 | $0 | 1.4 | $20,000 | $30,000 | $50,000 | $481,600 | **10.4%** |
| Winchester Creek | 0.2 | $10,000 | 0.9 | $10,000 | $10,000 | $30,000 | $621,600 | **4.8%** |
| | | | | **Primary Total:** | | **$319,845** | **$4,236,000** | **7.6%** |

**Road Projects Not Associated with Commercial Forest Management Operations**

| | | | | | | |
|---|---|---|---|---|---|---|
| Road Maintenance | | $125,000 | | | | $125,000 |

* rock stockpiles and potential landing construction

** road maintenance value based on average yearly cost is $250,000

## Table 7 REFORESTATION AND YOUNG STAND MANAGEMENT SUMMARY

District COOS Fiscal Year: 2015 06/20/2014

| | Board of Forestry | | | Common School Forest Lands | | | District | |
|---|---|---|---|---|---|---|---|---|
| Management Activity | Acres Planned | Average Cost*/Acre | BOF Cost | Acres Planned | Average Cost*/Acre | CSL Cost | Total Acres | Total Cost |
| Initial Planting | 0 | $360.00 | $0.00 | 225 | $360.00 | $81,000.00 | 225 | $81,000.00 |
| Interplanting | 60 | $140.00 | $8,400.00 | 100 | $140.00 | $14,000.00 | 160 | $22,400.00 |
| Underplanting | 0 | $0.00 | $0.00 | 0 | $0.00 | $0.00 | 0 | $0.00 |
| Tree Protection-Barriers | 0 | $0.00 | $0.00 | 20 | $140.00 | $2,800.00 | 20 | $2,800.00 |
| Tree Protection-Direct Control | 60 | $40.00 | $2,400.00 | 465 | $40.00 | $18,600.00 | 525 | $21,000.00 |
| Site Prep-Chemical- Aerial | 0 | $90.00 | $0.00 | 225 | $90.00 | $20,250.00 | 225 | $20,250.00 |
| Site Prep-Chemical- Hand | 0 | $125.00 | $0.00 | 0 | $125.00 | $0.00 | 0 | $0.00 |
| Site Prep -Slash Burning | 0 | $125.00 | $0.00 | 50 | $125.00 | $6,250.00 | 50 | $6,250.00 |
| Site Prep -Mechanical | 0 | $0.00 | $0.00 | 0 | $0.00 | $0.00 | 0 | $0.00 |
| Fertilization | 0 | $0.00 | $0.00 | 0 | $0.00 | $0.00 | 0 | $0.00 |
| Noxious weeds | 10 | $50.00 | $500.00 | 100 | $50.00 | $5,000.00 | 110 | $5,500.00 |
| Release-Chemical- Aerial | 0 | $60.00 | $0.00 | 0 | $60.00 | $0.00 | 0 | $0.00 |
| Release,-Chemical-Hand | 35 | $125.00 | $4,375.00 | 0 | $125.00 | $0.00 | 35 | $4,375.00 |
| Release-Mechanical-Hand | 50 | $140.00 | $7,000.00 | 160 | $140.00 | $22,400.00 | 210 | $29,400.00 |
| Precommercial Thinning | 30 | $150.00 | $4,500.00 | 200 | $150.00 | $30,000.00 | 230 | $34,500.00 |
| Pruning | 0 | $0.00 | $0.00 | 0 | $0.00 | $0.00 | 0 | $0.00 |
| Big Game Repellant (BGR) | 15 | $40.00 | $600.00 | 150 | $40.00 | $6,000.00 | 165 | $6,600.00 |
| **Totals** | **260** | -- | $27,775.00 | **1,695** | -- | $206,300.00 | **1,955** | **$234,075.00** |

*Planting costs include all costs including seedlings

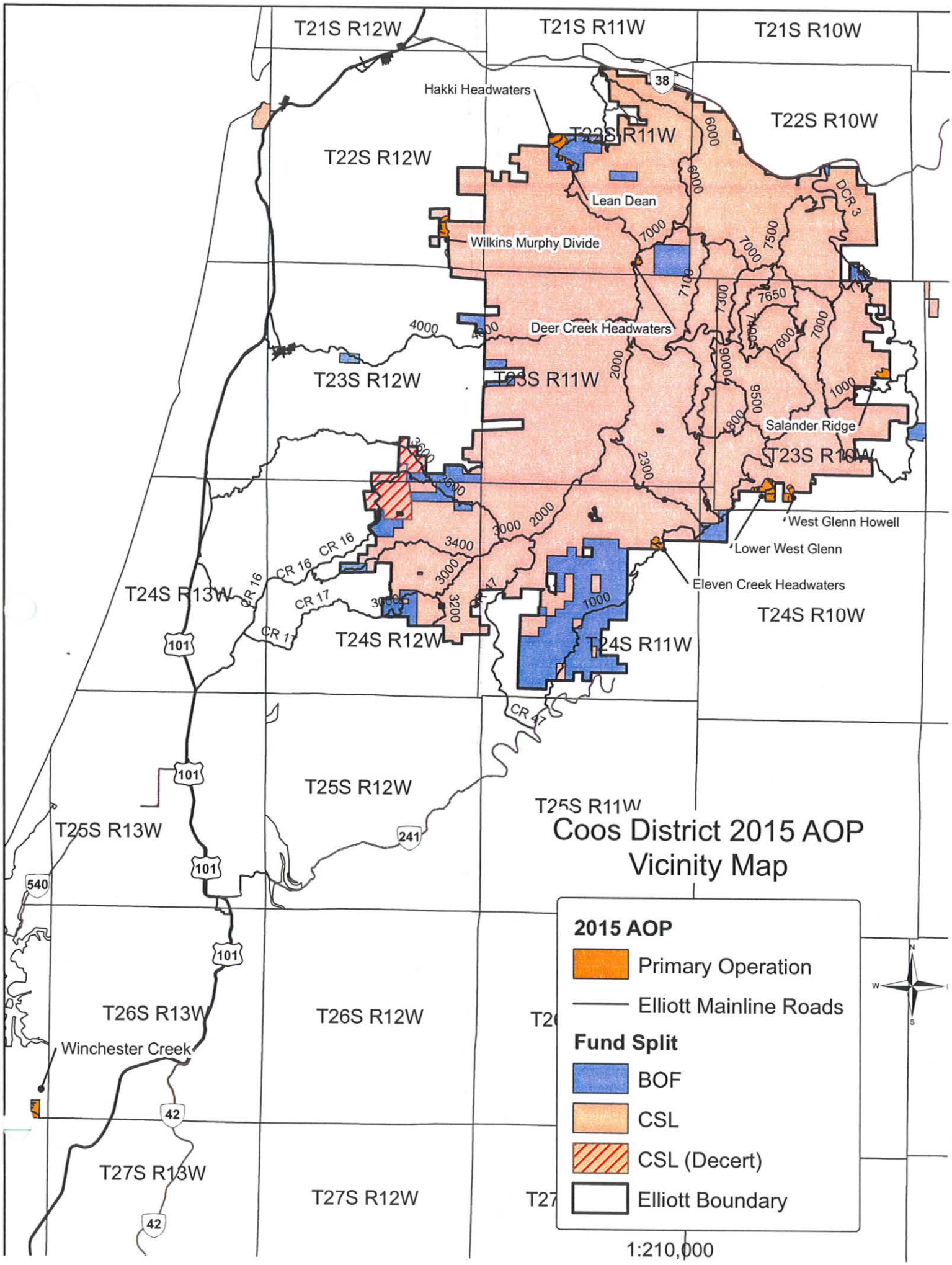
## Table 8 RECREATION MANAGEMENT SUMMARY

District: Coos  Fiscal Year: 2015  Date: 06/20/2014

| Operation | Unit of Measure | Current | Construction Projects | Construction Cost (Funding) ODF | Construction Cost (Funding) Other | Improvement Projects | Improvement Cost (Funding) ODF | Improvement Cost (Funding) Other | Total Cost | Comments |
|---|---|---|---|---|---|---|---|---|---|---|
| **Facilities** | | | | | | | | | | |
| Campsites | Sites | | | | | | | | $0 | |
| Day Use Areas* | | | | | | * | 0 | | $0 | |
| Trailheads | | | | | | | | | $0 | |
| Interpretive Sites | | | | | | | | | $0 | |
| (Other) | Sites | | | | | | | | $0 | |
| **Trails** | | | | | | | | | | |
| Non-Motorized | Miles | | | | | | | | $0 | |
| Motorized | Miles | | | | | | | | $0 | |

| Total: | $0 |
|---|---|

* Refuse removal and Road Maintenance of undeveloped camping spots primarily along the West Fork Millicoma & Elk Creek


T21S R12W
T21S R11W
T21S R10W
T22S R12W
T22S R11W
T22S R10W
T23S R12W
T23S R11W
T23S R10W
T24S R13W
T24S R12W
T24S R11W
T24S R10W
T25S R13W
T25S R12W
T25S R11W
T26S R13W
T26S R12W
T27S R13W
T27S R12W
Hakki Headwaters
Lean Dean
Wilkins Murphy Divide
Deer Creek Headwaters
Salander Ridge
West Glenn Howell
Lower West Glenn
Eleven Creek Headwaters
Winchester Creek
CR 16
CR 17
CR 41
38
101
241
540
42
DCR 3
Coos District 2015 AOP
Vicinity Map
2015 AOP
Primary Operation
Elliott Mainline Roads
Fund Split
BOF
CSL
CSL (Decert)
Elliott Boundary
1:210,000

# United States Department of the Interior

FISH AND WILDLIFE SERVICE
Oregon Fish and Wildlife Office
2600 SE 98th Avenue, Suite 100
Portland, Oregon 97266
Phone: (503) 231-6179 FAX: (503) 231-6195

Reply To: 8503.2004(14)
TS Number: 14-514

APR 29 2014

Liz Dent
State Forests Division Chief
Oregon Department of Forestry
State Forester's Office
2600 State Street
Salem, OR 97310-1336

Dear Ms. Dent:

This responds to your April 1, 2014, letter requesting review of eight timber sales, proposed to be included in the Fiscal Year 2015 Annual Operations Plans, for potential impacts to the federally-listed northern spotted owl (*Strix occidentalis caurina*). The timber sales include: Lean Dean, Lower West Glenn, Salander Ridge, Wilkins Murphy Divide, 1100 Tom, Rockpit 2015, Wildwood Thin, and Speed Walker. Rockpit 2015, Salander Ridge, and Speed Walker occur in spotted owl designated critical habiat. Attached with your letter were the pre-operations reports and preliminary biological assessments for the proposed timber sales. Our comments are based upon the information provided.

The Lower West Glenn and Wildwood Thin timber sales are composed of trees less than 50 years-old. The sale areas do not contain suitable spotted owl habitat, but are located on the outer edges of two northern spotted owl territories represented by their 1.5 mile provincial home range radii. Based upon the distance from the spotted owl activity center and the absence of suitable habitat, we concur with your assessment that these two timber sales have a low risk of negatively affecting spotted owls.

The 1100 Tom timber sale includes 153 acres within the home range radius of the Under North spotted owl activity center that will be thinned to about 101 trees per acre. This is a light to moderate thin from below which will retain dominant trees. Canopy coverage should not be dramatically decreased, but the thinning may temporarily degrade the quality of the spotted owl habitat due to the canopy coverage decrease. The intent of this thinning is to speed up the growth of the remaining dominant trees to provide higher quality habitat sooner than would occur without the thinning. The timber sale is about 0.8 miles from the Under North activity center. Timber stand ages range from about 56 to 63 years-old. According to the preliminary biological assessment, there are about 59 acres of lower quality suitable habitat within these 153 acres. Even if all of the 153 acres are considered suitable, there would be approximately 54 percent of the area within the 1.2 mile provincial home range radius remaining as suitable habitat. Based upon our review of the information provided, we concur with your assessment that the risk of negatively affecting spotted owls is low due to: the remaining percentage of suitable habitat post-harvest, the distance from the activity center of the harvest, and the low quality of the habitat to be harvested.

The Lean Dean timber sale consists of clearcut harvest of two areas totaling 21 acres of mostly 133 year-old Douglas-fir. This timber sale overlaps with two spotted owl activity centers which have 1.5 mile provincial home radii. The five acres within the home range of the Dean Creek site are located about 1.4 miles from the activity center. The 14 acres located within the home range of the Scholfield Creek site are about 1.3 miles from the activity center. Five of these acres are those found in the Dean Creek home range radius. Post-harvest, about 54 percent of the area within the home range radius of the Dean Creek site will remain in suitable habitat, and about 58 percent of the area within the home range radius of the Scholfield Creek site will remain in suitable habitat. Based upon our review of the information provided, we concur with your assessment that the risk of negatively affecting spotted owls is low due to: the remaining percentage of suitable habitat post-harvest and the distance from the activity center of the harvest.

Rockpit 2015 was a primary timber sale in the 2014 Annual Operations Plan and is now an alternate sale in the 2015 Annual Operation Plan. This timber sale included 169 net acres that averaged trees between 48 to 53 years-old and is located within 1.3 miles of the Bear Windy and Windy Fortune provincial home range radii. There have been no changes to the design, boundary, or habitat conditions surrounding this sale. We previously concluded in a June 26, 2013, letter to you that this timber sale had a low risk of negatively affecting spotted owls and reiterate that conclusion.

The Speed Walker timber sale consists of a modified clearcut of 44 net acres that will include harvest of Douglas-fir and most red alder, but retaining an average of 6 trees per acre of some of the largest conifer, cedar, and maple instead of the more typical 2 to 4 trees per acre which may not be among the largest. The entire approximately 77 year-old stand is considered suitable spotted owl habitat. This timber sale occurs about 0.45 miles from the McVey Creek spotted owl activity center. Much of the habitat surrounding this activity center is considered to be of high quality and there appears to be little fragmentation of forest stands. With the sale acres harvested, there would be 772 acres (78 percent) of suitable habitat remaining within 0.7 miles of the activity center, and 3,205 acres (71 percent) of suitable habitat remaining within 1.5 miles of the activity center. Based upon our review of the information provided, we concur with your assessment that the risk of negatively affecting spotted owls is low due to: the remaining percentage of suitable habitat post-harvest and the high quality with good connectivity of the remaining habitat.

The Salander Ridge timber sale consists of two sale areas that will be clearcut totaling 51 net acres. The sale areas are a mix of 45 and 64 year-old Douglas-fir with a minor component of western hemlock, red alder, bigleaf maple, and myrtle. Approximately 20 acres in the older age class is considered to be suitable spotted owl habitat and is located about one mile from the Salander Creek spotted owl activity center. Post-harvest there will be about 69 percent of suitable spotted owl habitat remaining within the 1.5 mile provincial home range radius of the Salander Creek spotted owl site. Based upon our review of the information provided, we concur with your assessment that the risk of negatively affecting spotted owls is low due to: the remaining percentage of suitable habitat post-harvest and the distance from the activity center of the harvest.

The Wilkins Murphy Divide timber sale totals 63 net acres of clearcut harvest. Fifty-seven acres of the sale area is composed of 113-153 year-old Douglas-fir stands with a minor component of western hemlock, red alder, bigleaf maple, and myrtle and is considered suitable spotted owl habitat. Approximately six acres of the sale area are composed of 34 year-old Douglas-fir and is not considered functioning suitable spotted owl habitat. This timber sale will remove two acres of suitable habitat within the 0.7 mile radius of the Murphy Creek spotted owl activity center and 57 acres within its 1.5

mile radius. After harvest, there will be approximately 64 percent and 48 percent suitable habitat remaining within the 0.7 mile and 1.5 mile radii, respectively, around the Murphy Creek spotted owl activity center. Based upon our review of the information provided, we concur with your assessment that the risk of negatively affecting spotted owls is low due to: the remaining percentage of suitable habitat post-harvest and the distance from the activity center of the majority of the harvest.

If you have any questions about this response, please contact Richard Szlemp at 503-231-6179. We appreciate your efforts to avoid negative impacts to federally-listed species such as the northern spotted owl, and look forward to continued coordination in this regard.

Sincerely,

for Judy E. Caicco

Paul Henson
State Supervisor

**CONFEDERATED TRIBES OF**
**COOS, LOWER UMPQUA & SIUSLAW INDIANS**
1245 Fulton Ave. Coos Bay, OR 97420
Phone (541) 888-9577 or 1-888-280-0726
Fax (541) 888-2853

5 May 2014

Ryan Greco
Acting Assistant District Forester
Oregon Department of Forestry
Coos District

*Re:* 2015 AOP- Lower West Glenn, West Glenn Howell, Eleven Creek Headwater, Salander Ridge, Wilkins Murphy Divide, Deer Creek Headwater, Hakki Headwaters

Dear Mr. Greco,

The Ancestral Territory of the Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians extends from the mouth of Tenmile Creek (Lane County) in the north, south to Fivemile Point halfway between the mouths of Whiskey Run Creek and Cut Creek (coinciding with the border between Sections 30 and 31, Township 27 South, Range 14 West, Coos County), thence east to the crest of the Coast Range (to Weatherly Creek on the Umpqua River.) As such, the proposed work is inside of the Ancestral Territory of the Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians. The Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians have no objection to the proposed work based on adverse impacts to known cultural resources.

Please feel free to contact me if I may be of any further assistance.

Sincerely,

Stacy Scott
Cultural Resources Protection Specialist/THPO

CC: Files

**CONFEDERATED TRIBES OF**
**COOS, LOWER UMPQUA & SIUSLAW INDIANS**
1245 Fulton Ave. Coos Bay, OR 97420
Phone (541) 888-9577 or 1-888-280-0726
Fax (541) 888-2853

5 May 2014

Ryan Greco
Acting Assistant District Forester
Oregon Department of Forestry
Coos District

*Re:* 2015 AOP- Winchester Creek

Dear Mr. Greco,

The Ancestral Territory of the Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians extends from the mouth of Tenmile Creek (Lane County) in the north, south to Fivemile Point halfway between the mouths of Whiskey Run Creek and Cut Creek (coinciding with the border between Sections 30 and 31, Township 27 South, Range 14 West, Coos County), thence east to the crest of the Coast Range (to Weatherly Creek on the Umpqua River.) As such, the proposed work is inside of the Ancestral Territory of the Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians. The Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians have no objection to the proposed work based on adverse impacts to known cultural resources.

Please be aware that the proposed work area is in proximity to known cultural resource sites and so may contain as yet unlocated cultural resources. We request to do a site visit prior to the start of the proposed work. We further request that we be contacted immediately if any known or suspected cultural resources are encountered during the work.

Please feel free to contact me if I may be of any further assistance.

Sincerely,

Stacy Scott
Cultural Resources Protection Specialist/THPO

CC: Files

**CONFEDERATED TRIBES OF**
**COOS, LOWER UMPQUA & SIUSLAW INDIANS**
1245 Fulton Ave. Coos Bay, OR 97420
Phone (541) 888-9577 or 1-888-280-0726
Fax (541) 888-2853

27 May 2014

Ryan Greco
Acting Assistant District Forester
Oregon Department of Forestry
Coos District

*Re:* 2015 AOP- Winchester Creek

Dear Mr. Greco,

The Ancestral Territory of the Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians extends from the mouth of Tenmile Creek (Lane County) in the north, south to Fivemile Point halfway between the mouths of Whiskey Run Creek and Cut Creek (coinciding with the border between Sections 30 and 31, Township 27 South, Range 14 West, Coos County), thence east to the crest of the Coast Range (to Weatherly Creek on the Umpqua River.) As such, the proposed work is inside of the Ancestral Territory of the Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians. The Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians have no objections to the proposed work based on adverse impacts to known cultural resources.

Please feel free to contact me if I may be of any further assistance.

Sincerely,

Stacy Scott

Stacy Scott
Cultural Resources Protection Specialist/THPO

CC: Files

**Public Comment Process for the 2015 Annual Operation Plan**

The Oregon Department of Forestry issued a Press Release on March 17, 2014, announcing a formal 45 day public comment period for the 2015 Annual Operations Plans from March 17 - May 2, 2014.

The purpose of the Public Comment Period was to provide an opportunity for the public to review the AOPs, ask questions, make recommendations and offer comments. As a public agency, ODF operates in the best interest of Oregonians, conducting business in an open way with opportunities for scrutiny to foster and maintain public confidence that ODF operations are benefiting Oregonians.

Past experience has shown that public comments have the potential to improve plans, so the objective was not only to inform the public, but to receive feedback that would help to clarify the AOPs, improve their consistency with the long range FMPs and IPs, and to become aware of any new information that could affect a planned operation or improve its efficiency or effectiveness.

At the end of the public comment period, the Coos District received 1 letter regarding the AOP. The district considered the questions, comments and recommendations in the letter. Factors that affected the districts consideration of the comments included:

- Does the comment enhance the consistency of the AOP with the FMP?
- Does the comment enhance the consistency of the AOP with the IP?
- Does the comment improve the clarity of the AOP?
- Does the comment provide new information that will affect the AOP or an operation?
- Does the comment improve the efficiency and effectiveness (or outcome) of the AOP?

The district then prepared a response that attempted to resolve each question or comment by providing additional information, discussing how the recommendation incorporated into the AOP, or explaining why the recommendation was not incorporated.

Note: A complete summary of all public comments and the districts responses related to the districts FY15 AOP can be found on our web site:

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

**Coos District FY15 AOP Changes from Draft Review AOP**
The following changes were made to the FY15 AOP since the end of the public review period (May 2, 2014). These revisions were the result of further analysis by district personnel.

- Elliott State Forest vicinity map was updated to reflect the new ownership boundary after three land sale parcels.

- Hakki Headwaters timber sale map was updated to reflect the new ownership boundary after three land sale parcels.
- The legend on the Social Subclasses FLMCS maps was corrected to show "Special Use" instead of "Special Stewardship"
- Language was added to the FLMCS update to clarify how the acreages have been updated over the past years.
- Changes to the Winchester Creek AOP include:
    - Added South Slough National Estuarine Research Reserve (SSNERR) boundaries on the map.
    - Listed the adjacent SSNERR as a key resource
    - Updated the reforestation mix to include a more diverse mix for re-planting.
    - Added equipment washing for ground based logging.
- Deer Creek Headwaters boundary was updated, the acreage for this unit was updated in any related tables.
- Planned activity in Joe's Creek and West Fork Millicoma River for in-stream log and boulder placement were added to Other Integrated Forest Management Operations section.
- Administration section was updated to reflect recent personnel reductions/organization.

Oregon
John A. Kitzhaber, MD, Governor

**Department of Forestry**
Coos District
63612 Fifth Road
Coos Bay, Oregon 97420
541.267.4136
FAX 541.269.2027
TTY 503-945-7213 / 800-437-4490
http:/ /www.odf.state.or.us

"STEWARDSHIP IN FORESTRY"

Francis E[redacted]
Cascadia Wildlands
[redacted]

Noah G[redacted]
Center for Biological Diversity
[redacted]

Chuck W[redacted]
Coast Range Association
[redacted]

Rhett L[redacted]
Sierra Club, Oregon Chapter
[redacted]

Doug H[redacted]
Oregon Wild
[redacted]

Joseph [redacted] Q[redacted]
Umpqua Watersheds
[redacted]

June 16, 2014

RE: 2015 AOP Public Comment Responses

Dear Ms. E[redacted], Mr. G[redacted], Mr. W[redacted] Mr. L[redacted], Mr. H[redacted] and Mr. Q[redacted]

Thank you for your comments on the Coos District 2015 AOP. Our responses to your comments are attached. Hopefully we have addressed your concerns adequately. The public comments along with the ODF reply will be posted on ODF's web site http://egov.oregon.gov/ODF/STATE_FORESTS/state_forests.shtml.

Sincerely,

Norma Kline
District Forester
Coos District

ODF's responses are organized according to the 7 sections of comments provided by Cascadia Wildlands, Center for Biological Diversity, Coast Range Association, Oregon Chapter Sierra Club, Umpqua Watersheds and Oregon Wild.

1. Marbled Murrelets

   You had many comments regarding the new 2013 MMMA's and how they could impact the 2015 AOP.

   First you commented that the new Footpuck MMMA does not include all continuous habitat. The new MMMA was drawn according to the August 28, 2013, Marbled Murrelet Operational Policy, sections 2.16 and 2.17.

   You had a concern with the shape of the Luder Mill MMMA and it being too narrow to support Murrelets. This MMMA is 1,541 acres and ranges in width from 515' to nearly 3000'.

   You commented that the new Central Johanneson MMMA fails to include all continuous habitat and that the buffer is available for clearcutting. Once again, we followed the Murrelet policy sections 2.16 and 2.17 for the designation of the MMMA boundaries. Clearcutting is not allowed in the buffers according to policy section 2.22.

   You commented that the new West Johnson MMMA is too small and very close to the Hatchery Johnson MMMA with a small slice of forest between them. Both of these MMMAs are bound by the Elliott State Forest Property boundary. The property between the MMMAs is private property. You mentioned that these two should be combined with the Middle Palouse MMMA in order to include all continuous habitat. The policy, section 2.26 and 2.27 directs how and when MMMAs designated prior to 2013 will be reviewed and modified.

   You asked a question about the "donut holes" in the new Elk Pass MMMA. ODF followed the Murrelet policy section 2.16 and 2.17 to include all continuous potentially suitable habitat within the survey area. The "holes" do not contain potentially suitable habitat. Another concern you had about the Elk Pass MMMA was that some areas of the old Elk Forks MMMA was "unMMMAed". We also followed the policy here, including only the potential suitable habitat in the survey areas where an occupied detection occurred. The areas not within the new Elk Pass MMMA were outside of the survey areas.

   You asked why the Elkhorn Ranch timber sale boundary spilled into the adjoining Elkhorn Ranch MMMA. This was simply a case of an upgrade in our information technology. The original MMMA boundary was drawn using an old USGS topography map, before our district received the latest LiDAR information. The MMMA boundary was originally drawn on the ridge as indicated in USGS topography, so the timber sale boundary was posted on that ridge. With the new LiDAR information it is clear now that the ridge is farther to the west than originally portrayed. You will notice that the Riparian Management Area along the West Fork Millicoma River extends further up the slope than the timber sale boundary indicates. Again this is due to upgrades in GIS/LiDAR information. There was no incursion into the MMMA.

2. Spotted Owls

   You state in your 2015 AOP comments that ODF failed to consider the USFWS NSO Recovery Plan.

ODF's approach to protecting and managing occupied sites is consistent with the USFWS NSO Recovery Plan. ODF complies with the 2011 Elliott Forest Management Plan, the Implementation Plan, and the Oregon Forest Practices Act, along with departmental policies, procedures and guidance that direct the decisions that are made.

You state that ODF failed to describe how recovery action 19, coordination between ODF and USFWS, was being implemented. The collaboration required in Recovery Action 19, between ODF and the Services has been accomplished, and is described on page five of the draft 2015 AOP, which states that ODF has shared the Biological Assessments and Pre-Operations Reports with the USFWS. The USFWS stated in their comments to ODF that the 2015 timber sales on the Elliott State Forest have a low risk of incidental take of Northern Spotted owls.

ODF is making a significant voluntary effort through the Elliott State Forest Management Plan, which is anticipated to retain 30 to 50 percent of the landscape as advanced structure.

3. Coho Salmon:

You stated: "Lean Dean Area 2 and Salander Ridge Area 2 also have "High Landslide Hazard Location Risk to Stream". Because they are not within a potential debris flow reach, the ODF can clearcut right over these small streams, with no tree buffer at all." However, please notice that streams in these sales will be surveyed and appropriate riparian protection will be applied as indicated in Table 12 for each sale.

You also stated that "many streams in the 2015 [AOP] have no tree-buffer at all, and some have an inadequate 25' no-harvest tree-buffer. Often this 25' tree-buffer is alder trees, which the ODF damages or kills, with herbicide spraying." ODF protects all streams according to their classification, including tree-buffers extending up to 160 feet from the channel. ODF applies herbicides to competing brush species to ensure successful reforestation and compliance with the Forest Practices Act. Herbicides are applied in accordance with Forest Practice Rules and label instructions.

4. Thinning:

The IP sets a target for a ten-year period for the partial cut of between 0 to 500 acres annually.

5. Other Problems with the 2015 AOP:

You comment that the 2015 Eleven Creek Headwaters timber sale of 51 acres is immediately adjacent to the 2013 Elk Ridge Split timber sale of 79 acres, and that this will violate the Forest Practices 120 acre limit rule.

Prior to proposing the Eleven Creek Headwaters sale area, the Elk Ridge Split timber sale was reduced to 53 acres. The total of these two sale areas complies with the Oregon Forest Practices Act limit of 120 acres for Type 3 harvest units.

You commented that Basin 9, Henry's Bend has been the target of large clearcuts every year that the IP has been implemented, in spite of the fact that the IP says that "Harvest opportunities in this basin are low". Basin 9 is a total of 8,432 acres. This year's sale Eleven Creek Headwaters is 51 acres, or 0.6% of the total basin area. The total of the four sales planned in this basin (Elk Ridge Split, Millicoma Overlook, Elk Ridge Split and Eleven Creek Headwaters) since the IP has been

implemented total 196 acres or about 2.3% of the total basin area. These sales represent a very small portion of the basin.

In regards to recreation, you commented that the 2015 AOP erroneously says that ATVs are only used on roads and for hunting, and that we should correct this. The 2015 AOP does not mention ATV use in connection with recreation, as you claim.

You requested the latest monitoring report. The Department of State Lands has not approved the funding for the Elliott State Forest Monitoring Plan, thus the monitoring plan has not been implemented. There are no monitoring reports to send.

You are concerned that ODF considers the release of 26,000 tonnes of Carbon insignificant. For 2015 the Elliott will sequester 774,000 tonnes of carbon, which is the equivalent of 151,000 cars.

You cited a 2010 commentary "The Manomet Study Got the Biomass Carbon Accounting Right" by Carellichio and Walker, in regards to forest carbon storage calculations. This commentary is a response to a June 2010 report by the Manomet Center for Conservation Sciences titled "Biomass Sustainability and Carbon Policy Study". This study researched the amount of carbon storage and the initial carbon debt, including the release of carbon and the additional greenhouse gasses from the burning of biomass to create energy, before and after units were harvested for biomass fuel. The 2015 timber sales planned by ODF do not include any harvests for biomass. Harvested timber from ODF sales is typically manufactured into structural lumber, plywood, or pulp products, storing the carbon instead of releasing it as burning it would. It would be inappropriate to apply your recommended carbon accounting to the 2015 AOP.

6. Winchester Creek Timber Sale

Because the Winchester Creek area has a different stand structure than the rest of the harvest areas in the 2015 AOP, we will consider finding more appropriate stock for this area. ODF will consider your comments and refine the mix to include Spruce, Western hemlock, Western Red cedar, Swiss needle cast resistant Douglas-fir and root rot resistant Port Orford cedar. In addition, we will implement an equipment washing requirement prior to leaving the site to minimize risk of spread of any possible existing POC root rot.

You voiced a concern that black bears could be killed to protect new tree plantations. ODF has no plans to trap or kill any black bears in the 2015 AOP. Instead ODF is planning on using less invasive strategies to control bear damage in this area, such as a tighter reforestation spacing to allow for bear damage.

You commented about the Coos District IP clearly stating that American Beavers that pose a risk to plantations can be killed. The IP does not state that American Beavers will be killed. It does state that they will be allowed to persist unless they are posing risks to stream crossings or plantations. If they are creating risks, the IP states that they may be trapped and relocation will be considered. (IP pg 61) You are correct in your statement that Beavers are important to riparian ecosystems and the FMP states very clearly that ODF shall protect American Beaver habitat whenever possible. (FMP – Aquatic Riparian Strategies).

You are concerned that the 2015 AOP for the Winchester Creek timber sale area does not list any recreation resources or other key resources identified for this area. The closest recreation trail area is more than ½ mile from the timber sale area. The key resources in the 2015 AOP will be updated

regarding the sale area being adjacent to the SSNERR.

7. Changes to Forest Land Management Classification

Regarding your comments about the Forest Land Management Classification, hopefully Justin Butteris' emails from April 29, 2014 cleared up any mis-understandings:

*"Apologies for the use of two different acronyms between the AOP and the IP. In both cases the text refers to Forest Land Management Classification System; the acronyms FLMCS, LMCS and FLMC are interchangeable in this case and refer to the Forest Land Management Classification System which is found in OAR 629-035-0050.*

*As far as the change in the FLMCS goes, The Board of Forestry adopted the rule change to OAR 629-035-0050 in June 2013, which separated "special stewardship" into "high value conservation areas" (HVCA) and "special use." The administrative rule identifies 3 subclasses for HVCA: 1) aquatic and riparian habitat 2) unique, threatened or endangered plants 3) wildlife habitat. For HVCA, the administrative rule requires: a legal requirement (e.g., FMP, ESA) identifies areas to maintain, enhance or restore important conservation values;* ***and*** *the management activities are limited to those that are compatible with achieving goals for the specific conservation value;* ***or*** *where a legal or contractual constraint dominates the management of the lands and directs the management of forest resources (emphasis added).*

*The Forest Management Plans and State Forest policies are used to determine how areas were reclassified into HVCA or special use. The administrative rule does not direct management strategies; management strategies are used to determine the appropriate classification in the FLMCS. That is, an area is managed as determined by the FMP and policies, and the management determines the classification. For example, riparian areas are managed in order to protect stream temperature, large wood recruitment and riparian habitat under the FMP. Since the focus of these riparian areas is first and foremost on aquatic and riparian habitat, they are classified as HVCA. The management standards for these areas are found in the FMP and applicable policies".*

*"The FLMCS is not prescriptive and never has been, so the answer to whether HVCA can be logged or not is "it depends." The management has not changed due to the change in classification. Some areas previously identified as Special Stewardship are now classified as HVCA, but the management is the same as it would have been if called "Special Stewardship." If the FMP and policy allows for any active management, those activities can still be conducted. If the FMP and policy prohibit any actions, those are still prohibited. The change in the FLMCS does nothing substantive to the management; think of it as changing the label on a map. The FMP and IP were not modified to include HVCA.*

*Lands are managed as described in the FMP and policy, not by how they are classified in the FLMCS. A Northern Spotted Owl circle which was last year classified as "Special Stewardship" is managed in exactly the same way classified as HVCA.*

*Any activity which could be previously undertaken in an area can still be undertaken after classification as a HVCA. The classification system does not protect anything because there are no management prescriptions in the FLMCS. How lands are classified is*

*determined by the management, not the other way around. In other words, "lands are HVCA because we protect them," not "lands are protected because they are HVCA."*

*The changes are in the AOP; we changed land classification labels from "Special Stewardship" to "Special Use" and "High Value Conservation Areas." That is the entirety of the change and the changes are shown in Appendix A in the AOP, so there is no need to update the AOP or extend the public comment period"*

You commented that it was unclear where the numbers came from for total acres in each classification because they did not correspond to the numbers in the FMP and IP. The original tables in the FMP and IP were updated last year with the 2014 FLMC update. The changes for this year are applied to those updated tables. You can find the final 2014 AOP, which contains the updated tables on our website (http://www.oregon.gov/odf/Pages/state_forests/aops/2014_approved.aspx). We will add language to the 2015 AOP to clarify where the numbers originated.

Thank you for pointing out the incorrect labels on the FLMCS maps. The "Special Stewardship" classification labels have been replaced with the "Special Use" label on the appropriate maps.

Cascadia Wildlands
we like it wild.

May 2, 2014

Tony Andersen, Oregon Department of Forestry
2600 State St.
Salem, OR 97310.
Emailed to: aopstateforests@odf.state.or.us.

**RE: Elliott 2015 Annual Operation Plan comments**

Dear ODF and DSL,

Please consider these comments from Cascadia Wildlands, on behalf of Center for Biological Diversity, Coast Range Association, Oregon Chapter Sierra Club, Oregon Wild, Umpqua Watersheds on the logging proposals in the 2015 Annual Operation Plan (AOP).

**The 2015 AOP for the Elliott proposes:**

* 507 acres of clearcutting 9 timber sales, including
  84 acres of marbled murrelet habitat up to 153 years old,
  65 acres of a 73-year-old forest adjacent to the South Slough National Estuary Reserve,
  358 acres of plantations from 45 to 64 years old;
* 0 acres of partial cut or thinning;
* .8 miles of new road construction;
* 225 acres of aerial herbicide spraying;
* 245 acres of ground herbicide treatment or "manual release by inmates with chain saws";
* Up to 525 acres of mountain beaver trapping, costing up to $21,000;
* Generating 13 MMBF of timber volume, 80% from CSFL;
* Changes to the Elliott's 2011 Forest Management Plan, including:
  Adopting the Forest Land Management Classification System (FLMC),
  Replacing Special Stewardship with High Value Conservation and Special Use Areas.

**Table of Contents**

Page
1. Marbled Murrelets ..... 2
2. Northern Spotted Owl ..... 4
3. Coho Salmon ..... 7
3. Thinning ..... 10
4. Other problems with the 2015 AOP ..... 10
   Including Basin 9, Recreation, Monitoring, and the Carbon Analysis
5. Winchester Creek Clearcuts in the South Slough Watershed ..... 13
   Including herbicides, forest diseases, fish and wildlife impacts to the SSNERR
6. Changes to Land Classifications ..... 18
   Including areas HVCA should increase and Scattered Tracts HVCAs
Conclusion and contact information ..... 21
Attachment 1 ..... 22

## 1. Marbled Murrelets

The 2015 AOP directly impacts marbled murrelet habitat in three sales, the 133-year-old Lean Dean sale, the 153-year-old Wilkins Murphy Divide, and the 73-year-old Winchester Creek sale next to the South Slough Reserve.

Outside of MMMAs, the ODF should not clearcutt potential murrelet habitat, even if surveys do not find murrelets nesting in any one year. The Wilkins Murphy Divide sale would clearcut 63 acres and Lean Dean would clearcut 21 acres of high-quality murrelet habitat. The near-by Scholfield and Middle Dean MMMAs are not adequate protection for murrelets. They are too small and narrow, providing marginal interior habitat. The ODF should not clearcut murrelet habitat until the near-by MMMAs are fully functioning.

The USFWS 1997 Murrelet Recovery Plan (page 143) says:

> Protect 'recruitment' nesting habitat to buffer and enlarge existing stands, reduce fragmentation, and provide replacement habitat for current suitable nesting habitat lost to disturbance events. Stands (currently 80 years old or older) that will produce suitable habitat within the next few decades are the most immediate source of new habitat and may be the only replacement for existing habitat lost to disturbance (e.g., timber harvest, fires, etc.) over the next century. Such stands are particularly important because of the vulnerability of many existing habitat fragments to fire and wind and the possibility that climate change will increase the effects of the frequency and severity of natural disturbances. Such stands should not be subjected to any silvicultural treatment that diminishes their capacity to provide quality nesting habitat in the future.

This is important advice to apply in the Elliott State Forest. The Elliott's Forest Management Plan (page 3-13) commits to considering this Plan. However, the AOP failed to do that.

The 2015 sales should have been fully surveyed for murrelets, with the results available for the public to comment on before being considered for clearcutting. The public should know how many nesting murrelets were found and what mitigation is proposed to protect them.

Due to 2013 murrelet surveys, 769 acres of new Marbled Murrelet Management Areas (MMMAs) and additions to existing MMMAs were designated[1]. The ODF failed to release the new MMMA locations until just 4 days before these comments were due. Next year the ODF should give us more time. Following are comments on these new 2013 MMMAs, and how they could impact the 2015 AOP.

The new Footpuck MMMA designated in 2013 does not include all continuous habitat. Not all mature forests appear to be included that should have been. Additionally, Footpuck MMMA should adjoin the near-by Luder Mill MMMA. The Luder Mill MMMA is a narrow band of habitat that includes virtually no interior habitat because of its snake-like shape. A murrelet could likely not survive there if it was clearcut around

[1] ODF 2013 Site Classification Form: Central Johanneson MMMA 316 acres, Footpuck MMMA 203 acres, West Johnson MMMA 250 acres.

the edges. The Footpuck MMMA was designated very close to the Luder Mill MMMA, but leaving another narrow band of forest available for clearcutting between the two. If the Footpuck and the Luder Mill MMMAs were joined, it would provide adequate interior habitat to protect murrelets.

The new Footpuck MMMA is also such a convoluted shape that it increases the edge effects. While smoothing out some of the edges mean including old clearcuts -- those areas can currently protect interior forests, and will eventually provide even higher quality habitat.

For the same reasons, the new Big Alder Fork MMMA should have been joined with the small Big Creek Junction MMMA designated in 2012. A narrow band between the two MMMAs, if clearcut, would severely degrade the Big Creek Junction MMMA, leaving it with no interior habitat.

The new Central Johanneson MMMA fails to include all continuous habitat, especially to its northeast and south. The buffer, available for clearcutting, contains some of the best habitat and should be moved into the MMMA.

The new West Johnson MMMA is too small, and just a few feet away from the existing Hatchery Johnson MMMA, also too small. These two MMMAs have just a small slice of forest between them. To their south is another narrow band of unprotected forest before the start of the Middle Palouse MMMA. All three of these MMMAs should be joined to increase effective interior habitat and to include all continuous habitat.

The new Elk Pass MMMA is a good size, except it appears to have numerous donut holes within it. What is the purpose of these donate holes? Since interior habitat is the most important criteria of a MMMA, sprinkling poke-a-dots that can be clearcut within the MMMA doesn't make any sense. If these circles are because younger habitat is scattered in the MMMA, its better to not clearcut them again, and let them grow within the MMMA.

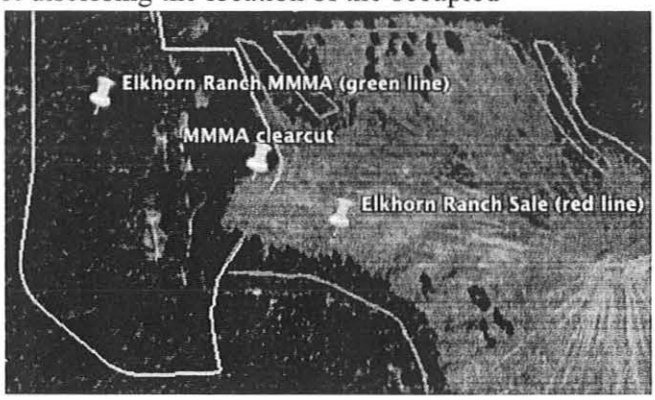
Another problem with the new Elk Pass MMMA is it appears to eliminate some of the previous MMMAs it was supposed to have incorporated. The ODF 2013 site classification form says: "Expanded Elk Pass MMMA now totals 1512 acres and includes occupied sites from old Elk Forks and Elk Pass MMMAs as well as ESF 229 sites". But the map provided by ODF shows that the new Elk Pass MMMA does not include all of those previous MMMAs. Some of the old Elk Forks MMMA areas appear to be undesignated, now available for clearcutting. One such area is immediately east of the new road built into the old Comados timber sale. Another area that got unMMMAed is north of the Elk Creek Switchback No. 2 sale in T24S, R11W, section 1. The ODF should explain why parts of the old MMMAs were eliminated.

ODF failed to designate MMMAs for all occupied murrelet habitat found in the 2013 murrelet surveys. In 2013 the Adams Ridge No.2 timber sale, state contracted surveyors recorded marbled murrelet occupancy, but no MMMA was designated. Also in 2013,

volunteer surveyors with Coast Range Forest Watch documented murrelet occupancy near Palouse Creek. An analysis of the occupied habitat was included in the timber appraisal report prepared by Northwest Forestry Services for the DSL in 2013, but no MMMA was designated. The state also failed to designate a MMMA for the occupied habitat found near the 8100 and 2300 roads by Coast Range Watch. Attachment 1 to these comments has a map of the murrelet siting location and associated occupied habitat.

There are also two murrelet occupied sites documented in the 2013 Site Classification Form, one for Little Tenmile Butte and one for Adams Creek No. 2, where ODFs survey results state the "MMMA designation is deferred pending decision on the sale of this parcel by the State Land Board". Does this mean the State is planning on selling these parcels with known occupied habitat, but not disclosing the location of the occupied habitat or designating a MMMA?

Finally, on the subject of MMMAs, the shapefiles given to us by ODF show that part of the Elkhorn Ranch MMMA was clearcut as part of the adjoining Elkhorn Ranch timber sale. The ODF should explain how or why clearcutting spilled into the MMMA. See picture on right.




**2. Spotted Owl:**

Four of the 2015 sales are within a spotted owl provincial circle: Lean Dean, Lower West Glenn, Salander Ridge, and Wilkins Murphy Divide. The Biological Assessment for these 4 sales explain that ODF will protect these owls by applying standards adapted from the USFWS "rescinded guidelines" from 1990! Rescinded 1990 guidelines? Instead, the ODF should be using the 2011 USFWS NSO Recovery Plan[2], not rescinded guidelines a quarter of a century old.

Another problem is that the ODF is claiming that 51-year-old tree plantations are adequate habitat replacement after these forests are clearcut. The BAs for these sales say: "suitable spotted owl habitat is considered to be stands at least 51 years old....", even for Lean Dean, 133 years old, and Wilkins Murphy Divide, 150 years old.

We are doubtful that a 51-year-old meets the FMP's definition of "advanced structure", requiring them to have all of the following[3]:

- 8 or more live trees per acre at least 32 inches in diameter,
- At least 6 snags per acre, 2 of which must be at least 24 inches in diameter; the remaining 4 must be at least 12 inches in diameter,
- A total of 3,000 to 4,500 cubic feet of downed logs in all decay classes 1 through 5; or 600 to 900 cubic feet per acre of sound downed logs in decay classes 1 or 2
- At least one large remnant tree per five acres

[2] Revised Recovery Plan for the Northern Spotted Owl. US Fish and Wildlife Service. 6-2011.
[3] Elliott State Forest FMP Final Plan November 2011. Page 5-9 (PDF page 209).

The ODF should confirm that the 51-year-old forests that would replace Lean Dean and Wilkins Murphy Divide's 150-year-old habitat have at least 8 trees per acre over 32" DBH, and meet the other requirements of advanced structure. For full public disclosure, the ODF should identify where these 51-year-old forests are located so we can monitor compliance by visiting these forests.

**NSO Recovery Plan:** The Elliott 2015 AOP failed to consider the Northern Spotted Owl Recovery Plan. This is a violation of the Elliott's Forest Management Plan, which says:

> The FMP will consider management plans and overarching planning documents of other agencies when managing for fish and wildlife (e.g., Oregon Conservation Strategy, Oregon Coast Coho Conservation Plan, **ESA recovery plans**).[4]

At least 4 Recovery Actions (RA) from the recovery plan applies to the Elliott State Forest: RA 10, 13, 19 and 32.

**Recovery Action 10** requires ODF to "Conserve spotted owl sites", including historically occupied sites.[5] The Recovery Plan states that the application of RA 10 on "state and private lands will more effectively address the threats of competition with and displacement by barred owls, as well as the impacts of past and current habitat loss."[6] RA 10 requires that "non-federal land managers should work with the Service to prioritize known and historic spotted owl sites for conservation and/or maintenance of existing levels of habitat."[7]

The 2015 AOP failed to identify the historically occupied sites and failed to describe how RA 10 was being implemented for these sites. If nothing else, a monitoring report should document where this has been considered.

RA 10 also recommends the State to "avoid activities that would reduce nesting, roosting and foraging habitat within provincial home ranges…" Clearcutting high-quality spotted owl habitat violates this recommendation.

**Recovery Action 13** requires the ODF to "Standardize province-specific habitat definitions across the range of the spotted owl using a collaborative process…. there are portions of the range where habitat on Federal lands are lacking or of low quality or where there is little Federal ownership, and State and private lands may be able to improve recovery potential in key areas."[8] The 2015 AOP failed to describe how this collaboration is being implemented. The Recovery Plan explains:

> "Given the continued decline of the species, the apparent increase in severity of the threat from barred owls, and information indicating a recent loss of genetic diversity for the species, we recommend conserving occupied sites and unoccupied, high-value

---

[4] Elliott State Forest Forest Management Plan. 2011. ES-10 and 3-13.
[5] NSO Revised Recovery Plan. USFWS. 6-2011. page III-42-43. "This recommendation includes currently occupied as well as historically occupied sites".
[6] NSO Recovery Plan III-43.
[7] NSO Recovery Plan III-44.
[8] NSO Recovery Plan III-50.

spotted owl habitat on **State** and private lands wherever possible."[9]

This concern with barred owls applies directly to the Elliott State Forest. Sales in the 2015 AOP have historic sites and unoccupied, high-value spotted owl habitat.

**Recovery Action 19** requires cooperation from ODF in a scientific evaluation of "the potential role of State and private lands in Oregon to contribute to spotted owl recovery."[10] It also asks for "coordination between the Oregon Department of Forestry and the Service to receive routine summaries of forest operations"[11]. The 2015 AOP failed to describe how this collaboration is being implemented.

**Recovery Action 32** states that: "Because spotted owl recovery requires well distributed, older and more structurally complex multi-layered conifer forests on federal and **non-federal lands**, land managers should work with the Service… to maintain and restore such habitat…[12]. This applies to the forests in the Wilkins Murphy Divide and Lean Dean proposed clearcuts.

The high-quality spotted owl habitat found in the Wilkins Murphy Divide and Lean Dean proposed sales should be protected by application of Recovery Action 32, especially since RA 32 doesn't go far enough. There is no evidence that protecting just a subset of the highest quality owl habitat will be enough to ensure co-existence between spotted and barred owls, and the Elliott State Forest has an increasing number of barred owls. A 2010 Draft report "Population Demography of Northern Spotted Owls" corroborates the need to protect more than just the highest quality spotted owl habitat as contemplated in the draft Recovery Action 32.

> We also found a negative relationship between recruitment rates and the presence of Barred Owls and a positive relationship between recruitment and the amount of suitable owl habitat in the study areas. Recruitment was higher on federal lands where the amount of suitable owl habitat was generally highest. [p 96] …
> In fact, the existence of a new and potential competitor like the Barred Owl makes the protection of habitat even more important, since any loss of habitat will likely increase competitive pressure and result in further reductions in Spotted Owl populations… In view of the continued decline of Spotted Owls in most study areas, it would be wise to preserve as much high quality habitat in late-successional forests for Spotted Owls as possible, distributed over as large an area as possible. ... Much of the habitat occupied by Northern Spotted Owls and their prey does not fit the classical definition of "old-growth" as defined by Franklin and Spies (1991), and a narrow definition of habitat based on the Franklin and Spies criteria would exclude many areas currently occupied by Northern Spotted Owls. [p 99]...[13]

---

[9] NSO Recovery Plan. III-51.
[10] NSO Recovery Plan. III-57.
[11] NSO Recovery Plan. III-58.
[12] NSO Recovery Plan. Page III-67
[13] Eric D. Forsman, Robert G. Anthony, Katie M. Dugger, Elizabeth M. Glenn, Alan B. Franklin, Gary C. White, Carl J. Schwarz, Kenneth P. Burnham, David R. Anderson, James D. Nichols, James E. Hines, Joseph B. Lint, Raymond J. Davis, Steven H. Ackers, Lawrence S. Andrews, Brian L. Biswell, Peter C. Carlson, Lowell V. Diller, Scott A.Gremel, Dale R. Herter, J. Mark Higley, Robert B. Horn, Janice A. Reid, Jeremy Rockweit, Jim

**Critical Habitat for the NSO:** The Elliott's 2015 AOP failed to consider the USFWS designation of Critical Habitat for the Northern Spotted Owl. This is a violation of the Elliott's Forest Management Plan, which says: "The FMP will consider management plans and overarching planning documents of other agencies when managing for fish and wildlife..."[14]

Salander Ridge is a 2015 proposed clearcut within designated Critical Habitat. This is near the recently clearcut Salander Between sale that was also mature forests in Critical Habitat. The Critical Habitat designation says:

> "Inclusion of [State of Oregon] lands in the critical habitat designation highlights their essential conservation role and provides opportunities for educating visitors to these areas, nearby landowners, and ODF about the potential conservation contribution of these lands to northern spotted owls.... this designation clearly indicates the value of these lands for the conservation of the northern spotted owl. We believe the value of the information included in the designation would provide an opportunity for management direction that focuses on benefits to the species."[15]

Salander Ridge is in Critical Habitat subunit OCR-5.

> "Special management considerations or protection are required in this subunit to address threats from current and past timber harvest and competition with barred owls.... We have determined that all of the unoccupied and likely occupied areas in this subunit are essential for the conservation of the species to meet the recovery criterion that calls for the continued maintenance and recruitment of northern spotted owl habitat. The increase and enhancement of NSO habitat is necessary to provide for viable populations of northern spotted owls over the long term... "[16]

Clearcutting Salander Ridge is not conducive to these goals. It will set this forest back from growing into spotted owl nesting habitat by up to 64 years. The 2015 AOP failed to consider the Critical Habitat designation, as required by the Elliott FMP. And if it was considered, ODF failed to inform the public of how it was considered

**3. Coho Salmon**

The 2015 AOP provides inadequate stream buffers for streams that support the ESA protected Coho Salmon. There are also small seasonal streams throughout the sale units that flow downstream into fish-bearing streams with inadequate buffers.

Deer Creek Headwaters, Eleven Creek Headwaters, Hakki Headwaters, Lower West Glenn and Wilkins Murphy Divide are all High Landslide Hazard Locations that have "risk to streams present" and all clearcut within a "potential debris flow track reach". This means the clearcut can be as close as 25' to the small streams, with only 10 trees per

---

Schaberl, Thomas Snetsinger, Stan Sovern. "Population Demography of Northern Spotted Owls." Draft #17 12-2010. http://www.reo.gov/monitoring/reports/nso/FORSMANetal_draft_17_Dec_2010.pdf

[14] Elliott State Forest 2011 Forest Management Plan. ES-10 and 3-13

[15] Final Rule. Designation of Revised Critical Habitat for the NSO. USFWS. 50 CFR Part 17. November 2012. Page 80-81

[16] Critical Habitat. page 200.

acre left in the next 75'. These stream buffers are inadequate and could facilitate the delivery of fish-killing sediment downstream to fish-bearing streams.

Adding to the problems, Lean Dean Area 2 and Salander Ridge Area 2 also have "High Landslide Hazard Location Risk to Stream". Because they are not within a potential debris flow reach, the ODF can clearcut right over these small streams, with no tree buffer at all.

The ODF retains a 0' tree-buffer on these small streams, stripping them of all stream-side protection in the form of tree-shade and wood delivery. If the stream is a "potential debris flow track", then the ODF only has to leave a 25 feet tree buffer, even though trees within 200' would potentially reach the stream in the event of a landslide of other tree fall event. This degrades these streams as well as the fish-bearing streams they feed downstream.

The Elliott is riddled with landslides in clearcuts, adding sediment to fish-bearing streams. The ODF should do formal monitoring and quantify these landslides in an attempt to reduce their numbers in the future.

**Scientists have found ODF's Riparian Strategies insufficient to protect salmon.**
The Riparian Management Strategies in the 2015 AOP are virtually identical to those proposed in the Elliott's 2008 draft HCP. The National Marine Fisheries Service (NFMS) found the 2008 draft HCP strategies to be so inadequate in protecting fish that they refused to give ODF an incidental take permit for coho salmon. In spite of this critique, the ODF is continuing with these same, inadequate stream buffers in the 2015 AOP.

NMFS found that they were "unable to conclude the strategies would meet the conservation needs of our trust resources and provide for the survival and recovery of Oregon Coast (OC) coho salmon".[17] Specifically, NMFS sited stream temperature increases and a lack of wood delivery to streams as the biggest problems harming salmon. ODF should therefore have changed this riparian strategy for the 2015 AOPs.

To counteract claims by NMFS, Oregon hired the Independent Multidisciplinary Science Team (IMST), but the IMST was not pleased with ODF's strategy either[18]. They also gave poor grades to the type of buffers being used in the 2015 AOP. They found ODF was "over-optimistic" that proposed management actions will "result in achieving desired future conditions in aquatic and riparian ecosystems on the Elliott State Forest."[19] They found that the riparian strategy (the same strategy used in the 2015 AOP), is not based on the best available science[20] and that ODF's "conclusions are professional conjecture and not based on research..."[21] and that the ODF gives too much "credence to studies that support narrower buffers."[22].

---

[17] Letter from NMFS, 7-21-09, to Coos District Forester, "RE: Elliott State Forest Habitat Conservation Plan."
[18] Independent Multidisciplinary Science Team. 2010 Review of the Draft Elliott State Forest HCP and DEIS: (August 2008 drafts). Oregon Watershed Enhancement Board, Salem, Oregon. 10-6-2010
[19] Independent Multidisciplinary Science Team (IMST) Review. 2010. page 5-6.
[20] IMST Review. 2010. page 7.
[21] IMST Review. 2010. page 19.
[22] IMST Review. 2010. page 8.

The Science Team further described ODF's calculation of stream temperature to "be a problematic approach" and "may be weak".[23] They found that "The analysis does not explicitly account for the real extent of... harvesting effects in riparian management areas, which may significantly influence stream temperature...."[24]

For non-fish bearing streams (Type N) that feed fish streams, the Science Team found an abundance of problems with ODF's assumptions, such as: "it is problematic to generalize that waters warmed by upstream exposure by harvest will cool simply by being shaded downstream."[25] In spite of this finding, many streams in the 2015 have no tree-buffer at all, and some have an inadequate 25' no-harvest tree-buffer. Often this 25' tree-buffer is alder trees, which the ODF damages or kills, with herbicide spraying.

The Science Team found the ODF's riparian strategies to be "a convoluted series of assumptions and inferences, potentially rendering the approach subject to compounded errors or weaknesses of induction."[26] The Science Team found models that show a "150-foot unmanaged buffer was required to have sufficient shade"[27] to protect salmon in cool waters, and that in the Elliott, "shade levels in managed areas could remain below desired future conditions for decades."[28]

Since these assessments are on same riparian strategies used in the 2015 AOP, the ODF should have made a change to protect Coho Salmon habitat.

Also, consider the findings of a recent Science Review Panel Report on nutrient problems from too small riparian buffers[29]:

> Logging or fuels management treatments that disturb vegetation generate increased nitrogen leaching from forest soils that enters streams and wetlands by both surface and subsurface flow paths. Ground-disturbing activities and disturbed soil conditions can mobilize phosphorus via soil erosion. Logging disturbs vegetation and soils over large areas, and initial disturbance of forested lands tends to generate larger proportional increases in nutrient loading than repeat disturbances of agricultural or urban lands. Nutrient loading to headwater streams tends to transfer downstream and accumulate in larger rivers, lakes, estuaries, and nearshore marine ecosystems. Cumulative nutrient impairment of downstream receiving waters can occur without violation of nutrient standards in headwater streams, simply as a consequence of sustained increases in loading from stormwater runoff from forest roads and periodic logging. In effect, logging alters the entire regime of nutrient and sediment export. By virtue of their high density across the landscape, headwater streams with seasonal flow receive a large portion of the nutrients mobilized by up-slope disturbance.

---

[23] IMST Review. 2010. pages 11 and 12.
[24] IMST Review. 2010 page 12.
[25] IMST Review. 2010. page 13.
[26] IMST Review. 2010. page 14. Emphasis ours.
[27] IMST Review. 2010. page 16.
[28] IMST Review. 2010. page 16. Citing February 5, 2009 memo from Peter Leinenbach (USEPA, Seattle, WA) to Teresa Kubo (USEPA, Portland, OR)
[29] Independent Science Review Panel: Northwest Forest Plan, Aquatic Conservation Strategy. March 2014.

> Therefore full protection of wide Riparian Reserves along even the smallest stream channels (and surface-connected wetlands) is necessary for effective nutrient retention.
>
> Available science indicates that continuous, no-cut Riparian Reserves exceeding 30-50 m (100-150 ft) or more along all streams and wetlands are needed to fully mitigate the effects of up-slope logging on nutrient loading to freshwater systems.

The ODF should widen riparian buffers in the 2015 AOP based on this and other scientific findings.

**3. Thinning**

The 2015 AOP includes only clearcuts, no thinning, not even any thinning of young plantations. The same was true with the 2014 and 2013 and 2012 AOP. The 10-year Implementation Plan is being violated by not thinning. It says: "under the 2011 FMP… ODF anticipates that … commercial thinning will average about 250 acres per year."[30] If the ODF is going to comply with this, the 2016 AOPs will have to have 5 years of thinning, or about 1,250 acres. While the ODF could be allowed to have a year or so without thinning, some thinning must be done sometime. The ODF would do better by averaging 250 acres per year, and not save it all up for one year.

Thinning, or Partial Cuts, were assumed in the IP and FMP, and must be implemented on the Elliott. If not now, when? It is a clear violation of the FMP when Intermediate Structure stands are ALL being clearcut and none are being partial cut.

The IP says: "Intermediate Structure stands respond very well to partial cutting. Not only do the residual trees grow faster, but complex structures and diverse habitats develop more rapidly…"[31] The FMP estimated a number of intermediate structure stands that would grow into advanced structure. This estimation will not be accomplished if the ODF never thins in these forests.

**4. Other problems with the 2015 AOP**

**Exceeding 120 acres:** Eleven Creek Headwaters is 51-acre clearcut immediately adjacent to the 79-acre Elk Ridge Split 3013 timber sale, sold May 22, 2013 to Swanson Group. That would make a total of 130 acres recent clearcut, in violation of the 120-acre limit of the Oregon Forest Practices Act (FPA).

Hakki Headwaters, a 2015 80-acre clearcut proposal is almost adjacent to the 2014 timber sale Dean Scholfield, a 52-acre clearcut. 132 acres has cumulative impacts not considered, and the tiny row of trees being left between the two sales will blow down, resulting in a clearcut opening greater than 120 acres, violating the FPA.

---

[30] Elliott State Forest IP. page 16.
[31] Elliott State Forest IP. page 24.

Immediately adjacent to Hakki Headwaters is East Hakki, a part of the land sale the Department of State Lands just closed on. It went to Seneca Lumber, who bragged they will clearcut it. This, along with Hakki Headwaters and Dean Scholfield, will create a very large clearcut opening, clearly exceeding the FPA limit of 120 acres.

**Basin 9, Henry's Bend:** The 10-year IP says that the "Harvest opportunities in this basin are low". In spite of this, Basin 9 has been the target of clearcuts every year the IP has been implemented. This year it's the 51 acre Eleven Creek Headwaters sale, and last year it was the 42-acre Eleven Creek No. 3 sale, and the year before (2013) it was the 79-acre Elk Ridge Split and 24-acre Millicoma Overlook. It is not in compliance with the IP to have large clearcuts every year in a basin where harvest opportunities are low.

The ODF should be monitoring how many acres are sold in each basin over time. Please send us this monitoring information.

**Recreation:** The Elliott's Implementation Plan describes the Elliott as well known for it's "recreational opportunities"[32]. Unfortunately, there is $0 being spent on recreational opportunities[33] in the 2015 AOP budget. The excuse is that the public wants dispersed recreation. While this might be true, the current dispersed recreation occurring the Elliott is degrading resources, and should be monitored and problems corrected. For instance, in the most popular camping areas there are no sanitary facilities. Piles and TP ring these areas, causing unsafe conditions for the public and for fish and wildlife. The ODF should invest something in the way of pit toilets near their most popular camping spots. Another problem is camping trash. This is especially problematic for camping areas within MMMAs, where corvids are attracted to all the trash that is never picked up.

One camping spot on the 8100 road (in the middle of the Elkhorn Ranch MMMA) has become a popular playground for Off Highway Vehicles (OHVs, referred to as ATVs in the AOP). The 2015 AOP erroneously says ATVs are only used on roads and for hunting. This should be corrected. Motorized recreation enthusiasts have dug several large mud bogs to play in near the Millicoma River, and it is evident from crushed river-bank vegetation, they extend their play into the Millicoma River itself. We have pictures of trucks driving up and down the river in the location of coho spawning beds.

None of these problems are addressed in the 2015 AOP, and as in years past, the ODF refuses to admit this type of recreation exists on the Elliott. There is no monitoring of recreation. This should be corrected in the final AOP. The ODF should also consider maintaining non-motorized hiking trails in the Elliott.

**Monitoring:** A monitoring plan was completed in 2012, but apparently it is not being used, as the 2015 AOP says the DSL has not yet determined a funding level for the plan. The 2015 AOP is unclear if this means the FMP and IP are not being monitored at all. The ODF should be clear about this.

---

[32] Elliott State Forest IP page 9.
[33] Coos District 2015 AOP. Table 8, page 48. Recreation management summary, for a total of $0.00.

Monitoring questions have been raised throughout these comments, and we have asked for the monitoring results. If no monitoring is occurring, the ODF must stop all projects until the monitoring plan can be implemented.

For instance, the Elliott's monitoring plan requires ODF to: "determine whether forests designated as "Advanced Structure" meet the assumptions of adequate wildlife habitat, especially the quality of managed plantations that have recently grown into "Advanced Structure" (stands that have officially moved from intermediate structure into advanced structure)".[34] Until monitoring is done, replacement of high-quality spotted owl habitat with 51-year-old plantations cannot proceed.

The ODF is required to prepare annual reports of monitoring results. Please send us the latest monitoring report.

**Carbon analysis:** The 2015 AOP will release 26,000 tonnes of CO2 into the atmosphere.[35] The ODF considers the 26,000 tonnes insignificant because other areas that were clearcut earlier are sequestering carbon. Instead, the ODF should consider that those earlier clearcuts will never sequester enough carbon to make up for what was lost when they were clearcut, and thus don't make up for what ODF is now proposing to clearcut.

The ODF should have considered the loss of 26,000 tonnes, plus the loss of future sequestration in the 153 years it will take some of the forests to catch-up to where they are now. Indeed, it will never catch up if the rotation moves to 40 years. Instead, the Elliott will experience a significant, permanent net-loss of carbon from what existed before the 2015 AOP is implemented. The AOP failed to document this loss of carbon.

Analyses that claims logging is *carbon neutral,* because the forest captures and stores the same pre-harvest amount of carbon after a period of regrowth, is highly misleading. The proper analysis requires comparison of the amount of carbon with the project and without the project, not before and after logging. This is required to accurately determine the effect of vegetation removal on forest carbon storage.

> The only way to properly evaluate the net carbon impacts of energy from forest biomass [or any vegetation management] is to estimate … net change in atmospheric $CO_2$ levels over time *with* and *without* the harvest of wood biomass for energy. …[I]t is necessary to construct a baseline, or control, scenario (that is no biomass harvest). … Once a baseline is established, one can assess how switching to wood biomass would change atmospheric carbon levels. … [T]he information provided by only comparing forest carbon stocks before and after biomass harvest could be a very misleading indicator of the impact of biomass energy on the atmosphere.[36]

---

[34] ESF Monitoring Plan page 6 and 34
[35] Coos District 2015 AOP page 7.
[36] Carellichio, P., Walker, T. 2010. Commentary: The Manomet Study Got the Biomass Carbon Accounting Right. The Forestry Source. 4 Nov 2010. http://www.nxtbook.com/nxtbooks/saf/forestrysource_201011/index.php#/4.

**5. Winchester Creek timber sale would clearcut in the South Slough Watershed**

The 2015 Annual Operation Plans includes a pre-operation report for Winchester Creek timber sale, a 76-acre block of 73-year-old forests. The sale immediately adjoins, and is within the watershed of the South Slough National Estuarine Research Reserve (SSNERR).

The ODF should drop this sale. Since the Department of State Lands (DSL) owns both the Winchester Creek sale area and the SSNERR, DSL should just transfer management of this important part of the watershed over to the SSNERR.

The South Slough National Estuarine Reserve (SSNER or the Reserve) has a timber management plan for the upland part of their watershed, and it doesn't allow for clearcutting. If the ODF is going to log this parcel at all, it should be in compliance with the SSNER management plan since this parcel is virtually imbedded within the Reserve.

This is one of the Scattered Tracts older forests, over 70 years old, and well on it's way for prime wildlife habitat. In fact, it is older than most of the upland forests of the SSNERR. There are also remnant old-growth spruce trees in this unit – rare spruce trees who's seed source could help restore the native spruce forests on the entire SSNERR.

Thinning, or not logging at all, would enhance this forest. Instead, the AOP proposes to clearcut it, the entire 76-acre block adjacent to the SSNERR.

Sitka Spruce within the Winchester Creek proposed clearcut.

It is against the policy of the SSNERR to clearcut Winchester Creek, a sale area that has the SSNERR boundary on two sides. The management policy for the Reserve is to:

> Maintain the integrity of the estuary. Protect the estuary from uses and activities, both within and **beyond boundaries**, which may alter or affect the ecosystem and its natural dynamic processes; and Preserve the area for long-term scientific and educational uses. O.R.S. 273.533.1

Clearcutting that includes herbicide spraying and killing mammals that threaten seedlings, is not protecting the estuary from uses beyond its boundaries. Since the state owns the Winchester Creek sale area, as well as the SSNERR, it is well within the State's capacity to follow O.R.S. 273.533.1

**Herbicides:** The AOP states that Glyphosate and Imazapyr will be aerial sprayed over the 76 acres, including near the tributaries to Winchester Creek. The ODF must reconsider spraying herbicides into the estuaries watershed. The cumulative impact of ODF's herbicide spraying with the other industrial forests in the uplands of the estuary degrades healthy estuary functions. The ODF has previously only considered herbicide impacts on rivers that continuously flush themselves. By contrast, water collects in the

estuary. Before ODF sprays the uplands of the state's estuary reserve, the ODF should have some scientific evidence that the chemicals they are using will not harm an estuary. The state has spent millions of dollars trying to restore estuary functions in the South Slough. The ODF must show they not hurting those efforts.

**Dueling Desired-Future-Conditions:** ODF states that their "desired future condition" for the Winchester Creek sale is "an intermediate stand structure", meant to keep forests perpetually young with optimum monetary value. This is the opposite of the desired future condition of the Reserve's forest plan for the surrounding forests. The Reserve will restore native ecosystem functions and late-seral forests, protecting the estuary and downhill water quality. The ODF must address their conflicting Desired Future Conditions with the Reserve's goals, before clearcutting here. The State of Oregon has spent millions of dollars working toward the Reserve's desired future condition. Clearcutting Winchester Creek will work against those efforts, and actually cost the State more restoration money countering increased herbicide damage, increased ATV trespassing, increased water-runoff, and maybe even increased erosion. It doesn't make sense for the state to be restoring the estuary reserve with one hand, and degrading it with the other, using dueling Desired-Future-Conditions.

**Reforestation:** The ODF proposes to replant with up to 70% Douglas fir, when a Sitka spruce plant association dominated the original forest in this area. The ODF should instead replant with 70% Sitka Spruce and include plenty of disease resistant Port-Orford cedar trees. Clearcutting is bad enough, but converting a rare Sitka spruce plant association to a Douglas fir tree plantation adds lasting harm to ODF's actions.

Any natural Sitka spruce trees or Port-Orford trees should be retained and not cut, to help the conversion back to a natural stand condition.

**Forest Diseases:** The Winchester Creek AOP has a dash under "Forest Health Issues", indicating there are no forest health issues. We disagree. The AOP must be corrected to include Swiss Needle Cast (SNC) and Port Orford cedar root disease.

The Reserve's forest restoration plan documents the problems with **Swiss Needle Cast**[37] inside and near the SSNERR:

> "The Reserve's cool moist habitat with ample summer fog creates conditions which are ripe for infection of Swiss needlecast, a foliage disease specific to Doug fir caused by the fungus *Phaeocryptopus gaeumannii*, resulting in defoliation and reduction of growth.... Levels of infection within the reserve fluctuate from very light to severe depending on stem density and minor differences within geographic location."[38]

The Winchester Creek AOP never mentions Swiss Needle Cast, and contrary to all recommendations to combat Swiss Needle Cast, will replant a dense Douglas fir plantation, the most susceptible conditions for SNC. The 2015 Coos AOP Draft says that,

---

[37] SSNERR Upland Habitat Restoration Plan. March 2009. page 27.
[38] SSNERR Upland Habitat Restoration Plan. March 2009. page 59.

to control Swiss Needle Cast, ODF will "plant a greater diversity of species."[39] However, 70% Douglas fir, in a spruce vegetation zone, is not diverse enough, especially when SNC is documented to be severe adjacent to the sale area.

This is a Sitka spruce forest zone. But the Winchester Creek AOP left blank the field "Vegetation Zone:", instead of admitting it is within the Sitka Spruce zone. "The forests of SSNERR are contained within the *Picea sitchensis* zone"[40]. The ODF must not replant with a majority of Douglas fir in this area of Swiss needle cast.

The Winchester Creek timber sale adjacent to the SSNERR is within the range of **Port Orford Cedar** (POC). Clearcutting in the SSNERR watershed, and above the Port Orford Cedar within the SSNERR, has a strong potential of infecting the entire SSNERR with Port Orford cedar root rot *(Phytophthora lateralis)*. The Winchester Creek AOP failed to address how it would attempt to stop this terrible disease from infecting the South Slough National Reserve with logging equipment that carries the POC root disease.

The 2015 AOP Draft says "no natural POC has been documented in an inventory of the Elliott"[41], and that the root rot is "not a significant issue on the Elliott". However, this sale is not on the Elliott. It is a Scattered Tract parcel. Logging here has the potential to do a great deal of harm to POC downslope, as logging equipment spreads the root rot. Once the root rot spores enter a watershed, it eventually infects the entire watershed. While the Winchester Creek AOP ignored the fact it was within the watershed of the Estuary Reserve, the fact remains, the sale has the SSNERR downhill on two boundaries, and this sale will kill all downslope POC within the SSNERR.

**Wildlife:** Clearcutting the Winchester Creek 76-acres, with the SSNERR surrounding it on two sides, means ODF must degrade wildlife habitat not only on the 76 acres, but actually kill wildlife the SSNERR is meant to protect. For instance, black bears could be killed to protect the new tree plantation. The FMP says that bears foraging on trees would be trapped, which means the bears and their cubs would be killed, not relocated (2011 FMP C-11).

Mountain Beaver is another species that is part of the wildlife ecosystem on the SSNERR that the ODF will have to kill by putting a tree plantation immediately adjacent to the SSNERR. The AOP summary said ODF would trap mountain beavers on the entire 76 acres[42]. Trapping mountain beavers can kill other wildlife that wanders in from the Reserve, such as skunks and squirrels[43].

American Beavers *(Castor Canadensis)* are also common in the South Slough, and likely populate the small streams within or below the Winchester Creek timber sale[44]. The Coos District IP is clear that any beaver that poses "a risk to plantations"[45] can be killed and

---

[39] Coos District 2015 AOP Draft. Page 7.
[40] SSNERR Upland Habitat Restoration Plan. March 2009. page 30.
[41] Coos District 2015 Coos AOP Draft. Page 8
[42] Coos District 2015 Coos AOP Draft. page 13.
[43] http://www.extension.org/faq/1083.
[44] SS Management Plan. Page 2-9.
[45] Coos District Implementation Plan. Page 60

their beaver dams destroyed. Beavers are so important to riparian ecosystems that they are considered a keystone species. It is appalling that the ODF could kill beavers that travel into the sale from the adjoining SSNERR.

Killing wildlife that resides inside the Reserve and wanders to the adjacent timber sale, for the sake of timber production should not be allowed. The SSNER is reserved for the entire ecosystem, including the mammals ODF proposes to kill to accomplish intensive forest management.

**Key Resources were not identified:** The Winchester Creek AOP says there are no recreation resources "in or immediately adjacent to the operation"[46]. The ODF forgot the SSNERR is immediately adjacent to two sides of the sale, a very popular recreation site. The AOP also says there are no "other resources present in or around this operation that need special consideration". Again, the SSNERR was forgotten. The ODF must correct this mistake. The ODF should at least document in the AOP that such an important place borders this sale on two sides, and the sale is in the SSNERR watershed. In ODF's pre-operation report map, the Reserves boundaries were not even included. The ODF must at least document the values at stake.

In addition to impacting water quality and soil stability, the ODF is proposing to clearcut some of the oldest forests within the Reserve – the forests identified by the Reserve as the best places for protection, forests over 70 years old with remnant Sitka spruce. Clearcutting these important older habitats within the Reserve are counter to the Reserve's restoration forest plan.

**SSNERR Management Plan:** The South Slough is a 4,800 acre protected area located within the South Slough watershed in Coos Bay that includes approximately 4,000 acres of coastal upland and riparian habitats. ODF's plans for clearcutting inside the Reserve and in the watersheds of the Reserve, undermines the work and planning that has been put into the SSNERR Upland Forest Management Plan.[47] This plan says:

> "The desired future conditions that guide planned management activities will replicate the functions that produced what are now considered to be late successional or old growth forests. These functions have been compromised, in some cases severely, by 150 years of human intervention in the region."[48]

ODF's 2015 logging proposal will retard the ability of the Reserve to reach the desired future condition.

The Reserve's restoration plan states:

> "For more than ten years staff at the Reserve have been among the leaders in the Pacific Northwest contributing to coastal watershed stewardship and science through restoration, research, and educational activities addressing key tidal wetland and lower watershed habitats. The Reserve is now in the planning stages of applying that restoration, adaptive management and research framework (supported in part by

---

[46] Winchester Creek AOP page 5.
[47] SSNERR Upland Habitat Restoration Plan, March 2009. Jake Robinson. Forest Sciences Coordinator
[48] SSNERR Upland Habitat Restoration Plan. March 2009. Page 13.

GWEB/OWEB restoration and monitoring grants) to the management and restoration of degraded coastal forest and upper watershed riparian habitats in the Reserve.... By directing activities upslope the Reserve plans to test and demonstrate holistic approaches to coastal habitat management and restoration at a sub-basin level..."[49]

The Reserve's forest restoration plan details several kinds of thinning techniques for younger forests, and expresses the hopes that:

"Where possible, partnerships with adjacent landowners will be developed to include in the project the upper portions of those sub basins outside Reserve control."[50]

This includes the Winchester Creek timber sale area that ODF plans to clearcut, spray with herbicides and kill any mammal that threatens plantation trees. Clearcutting Winchester Creek is likely not the partnership that the Reserve had in mind, even though the Winchester Creek sale area is also owned by DSL. The ODF failed to address a potential partnership in the Winchester Creek AOP, or even acknowledge that the project bordered such an important place.

The Reserve's forest restoration plan states:

"Habitat restoration is a Reserve wide goal, from ridge top to wetlands.... a watershed scale approach will be taken in regard to restoring the natural processes..."[51]

ODF appears to be opposed to these goals.

**Coho Salmon and Water Quality:** Coho is an endangered species, and clearcutting the upland forests above its habitat harm this fish. The Reserve's forest restoration plan states:

"Coho Salmon (*Oncorrhyncus kisutch*) is listed as a threatened resident of the South Slough Estuary. The period of time spent in estuarine habitats is considered critical for migrating juvenile Coho as it provides the special salinity gradient for successful physiological changes required when moving from fresh to saline habitat. ... Since the riparian areas within SSNERR are quite narrow and often with steep dissected slopes, **the adjacent forest structure has the ability to directly affect the habitat quality**. *Lockwood 2005.* Forest restoration efforts within the upland areas as well as the riparian zone of influence should have a positive effect on Coho habitat.[52]

Clearcutting in the tributary to Winchester Creek, a fish bearing stream that directly feeds an estuary, will harm Coho salmon. Clearcutting the upland habitat will warm waters. Aerial spraying it with herbicides also degrades water quality.

Because the tributary to Winchester Creek, through the proposed clearcut area, is a perennial type N stream, the ODF can clearcut to within 25 feet of the creek, stripping from the stream most trees that could fall into the stream and provide fish-habitat downstream.

A healthy estuary increases fish populations, which increases a healthier fishing industry.

---

[49] SSNERR Upland Habitat Restoration Plan. March 2009. page 8.
[50] SSNERR Upland Habitat Restoration Plan. March 2009. page 8.
[51] SSNERR Upland Habitat Restoration Plan. March 2009. page 9.
[52] SSNERR Upland Habitat Restoration Plan. March 2009. page 10 (emphasis added).

The AOP fails to consider the money saved by the state in the ecosystem services provided by an estuary that is not degraded by upland forest practices. ODF should turn these 76 acres over to the Reserve to contribute to the Reserve's desired future condition.

**6. Changes to Land Classifications**

This AOP, Appendix A, proposes, "changes to the Coos District Forest Land Management Classification (FLMC), requiring a 30-day public comment period."[53]

We looked for the FLMC in the Elliott Implementation Plan to compare the changes. However, there was no Forest Land Management Classifications (FLMC). Instead, the Elliott's Implementation Plan (IP) had a Land Management Classification System (LMCS)[54]. If the 2015 AOP meant LMCS instead of FLMC, a correction must be made.

The 2015 AOP describes how "High Value Conservation" and "Special Use" labels will replace the "Special Stewardship" classification. "Proposed changes to the FLMC are described in detail and mapped in Appendix A."[55] However, Appendix A did not do that. We couldn't find anyplace that describes the standards of managing lands under these new classifications.

The ODF failed to describe the definition of Special Use and High Value Conservation Areas, and under what standards are they managed. Is logging allowed? There were no management standards in the FMP, the IP, or the 2015 AOP. They are not in any of the glossaries. The ODF should make this clear and then give the public another 30 days to provide comments on the maps showing these land designations once we know the meaning of the designations. It is confusing to add maps to the FMP and IP with designated land allocations, but none of the text in the FMP and IP referring to those land allocations.

Another problem is that acres in the 2015 AOP do not correspond with the acres in the IP and FMP. For instance, 2015 AOP Appendix A describes the changes to Table 2 on page 9 of the IP, by replacing it with Table 2 on page 1 of Appendix A. But Appendix A shows different numbers than the IP shows. For instance, General Stewardship BOFLs in the IP Table 2 is 1,583 acres, but Appendix A says it is 1,551 acres, being changed to 1,296 acres. Where did the AOP get the 1,583 acres to begin with if it's not in the IP? General Stewardship CSFLs in the IP is 18,203 acres, but in Appendix, it was 16,648 acres being changed to 14,208 acres. It is unclear where Appendix A in the 2015 AOP is getting their original numbers since they are not in the IP.

We understand that the "Special Stewardship" classification is receiving the biggest change that we are being asked to comment on. The Elliott IP gave the total acres of Special Stewardship to 24,967 acres. But Appendix A said the current Special Stewardship acres are 19,800 acres. What happened to the other 5,000 acres?

---

[53] Coos District 2015 AOP. Appendix A, page 1
[54] Elliott IP page 8.
[55] Coos District 2015 AOP page 4.

Comparing the "Stewardship Classifications" map in the IP, with the proposed changes in Appendix A, it appears the IP mapped "Special Stewardship" areas that were not carried over into the proposed changes to reclassify them as Special Use or HVCAs. The ODF should describe all Special Stewardship areas that have been dropped and moved into "Focused", available for clearcutting. For instance, on the NW corner of Basin 04, there is a "Special Stewardship" area that was not redesigned Special Use or HVCA. What was it, and why was it removed from anything special? How many other places were removed?

Comparing the Steward Classifications – On the "Biological Subclasses" map, it appears that "Plants" mapped have been taken out of "Special Stewardship" and not put in High Value Conservation Areas. It was put in "Focused Stewardship" instead. Why? They can be clearcut under the Focused classification, but not under the Special Stewardship. It also appears the same thing happened to some "Aquatic and Riparian" areas, except for some "Aquatic and Riparian Habitat" areas. What is the difference, and what does this mean for the management of these streams, and why put some streams into Focused Stewardship, out of the old Special Stewardship designation? Why aren't all streams, especially all streams that feed into fish-bearing streams, in High Value Conservation Areas? While the ODF never gives us a definition of HVCAs, it sounds more protective than areas where most of the logging occurs.

All in all, the change in the Elliott's IP and FMP for land classifications is unclear and incomplete. Public meetings were not offered for this major change in the Elliott FMP, and it is virtually impossible to otherwise figure out what the results of the changes will be. The ODF should do a better job of presenting this information and then allow another 30 days of public comments.

**HVCAs should be increased:** Assuming High Conservation Value Areas are off-limits to logging and are adequately protected for a conservation value, their acres should be increased on the Coos District. For instance, the Elliott has some of the high production coho streams in the Oregon coast range. All coho streams should be designated HVCAs. The state's riparian buffers are very small compared to federal standards, meaning coho streams are warmer and starved of woody debris. The HVCA designation should include a full site tree height riparian buffer to those streams. Designating high value areas for fish habitat could also help reduce in-unit landslides, a chronic problem in the Elliott.

Wider areas next to the Millicoma and Elk Rivers should be designated HVCAs. They are important not only to fish habitat, but to upland wildlife use as travel corridors. They also contain most of the recreation dispersed camping sites on the Elliott.

All forests next to Loon Lake should be designated HVCA because of their important contribution to nesting bald eagles and other birds and wildlife who fish in the lake.

All old-growth forests remaining in the Coos District should be designated HVCA, as this wildlife habitat is very rare in the Coast Range.

All areas designated by the USFWS as Critical Habitat for any wildlife should be designated HVCA for wildlife in the Coos District. All spotted owl sites, including adequate foraging areas around the sites should be HCVAs. All spotted owl Habitat Conservancy Areas designated under the former HCP should be designated as an HCVA. Areas designated, as Marbled Murrelet Management Areas should be considered HVCAs, including the new MMMAs created annually.

We have additional comments on two "Scattered Tract's" parcels that are managed by the Coos District, but not on the Elliott. One is the parcel next to the Umpqua Lighthouse State Park, and the other is next to the South Slough National Estuary Research Reserve.

**Scattered Tract Parcel adjacent to Umpqua Lighthouse State Park:** This scattered tract is one of the most important recreation areas the state owns. Three sides are driving routes into and out of the State Park or adjacent to highway 101. This parcel is a mature Sitka spruce ecosystem, providing important wildlife habitat. It will eventually be added to the non-motorized Umpqua Lighthouse State Park for hiking and scenic recreation.

The map on page 39 shows a HVCA was added to the stream flowing through this important recreation area. But "Focused" is the buffer on the stream, meaning that buffer (and the entire parcel) can be clearcut. At least the stream buffer should be changed to a HVCA also. Also on the page 39 map, a "Focused" allocation is shown along the eastern edge of this parcel, the main drive into the Umpqua Lighthouse State Park. This important recreation area should have had a HVCA, not an allocation that allows clearcutting.

The map shows a "Special Stewardship" classification for this parcel along highway 101. However, we thought the "Special Stewardship" classification was being replaced by the "Special Use" classification. It is unclear, under any classification, if this highway 101 buffer could be clearcut, or if it is protected. If it is protected, it is way too narrow. If the stand behind it is clearcut, the buffer can be seen through, and will likely blow down.

The map on page 42 shows this same scattered-tract parcel adjacent to the Umpqua Lighthouse State Park has having two different land allocations. Now the strip along highway 101 is classified as "visual" Special Stewardship and the strip along the western edge, the main route into the park, as "visual" Focused Stewardship. The DSL should explain how these two "visual" designations differ in management (can they both be clearcut?). Also, both the classifications of Special Stewardship and Focused Stewardship are being replaced by Special Use and High Value Conservation Areas. This map is showing classifications that no longer apply.

Instead of this confusing and piecemeal land allocation, the entire parcel should be classified as a high value conservation area because it adjoins the Umpqua Lighthouse State Park. The west border is the main drive into the park. The southern border adjoins the state park with the main driving route into the campground, and the eastern border is along highway 101. This parcel will be an important addition to the Park since the State Park lost one-third of its landmass to a Douglas County ATV play area a few years ago.

It is also a rare ecosystem, a mature Sitka spruce forest important for it's genetic contribution to the missing Sitka spruce coastal forests, and a mature forest important to marbled murrelets and other wildlife. The ODF should NEVER clearcut this stand. That should be reflected in a HVCA classification.

**Scattered Tract parcel adjacent to the South Slough National Estuary Research Reserve (SSNERR):**

This parcel should be classified as HVCA – the entire parcel. It is being proposed for clearcutting in the 2015 AOP, and elsewhere in these comments we detail it's important ecological contributions to the SSNERR.

The Appendix A map of this Scattered Tract parcel shows the stream running through the parcel, that feeds Winchester Creek in the SSNERR, as "Focused Stewardship", a stream that can be clearcut right over. Clearly, this entire parcel needs to be HVCA.

**This concludes our comments on the 2015 Elliott Annual Operations Plan.** Please modify those plans, and provide additional commenting time on the changes to the Elliott's FMP's Land Management Classification System.

Francis Eatherington
Cascadia Wildlands
P.O. Box 10455, Eugene Oregon, 97440
franci@cascwild.org 541-643-1309

Noah Greenwald, M.S.
Center for Biological Diversity
PO Box 11374, Portland, OR 97211

Chuck Willer
Coast Range Association
P.O. Box 2250, Corvallis, Oregon 97339

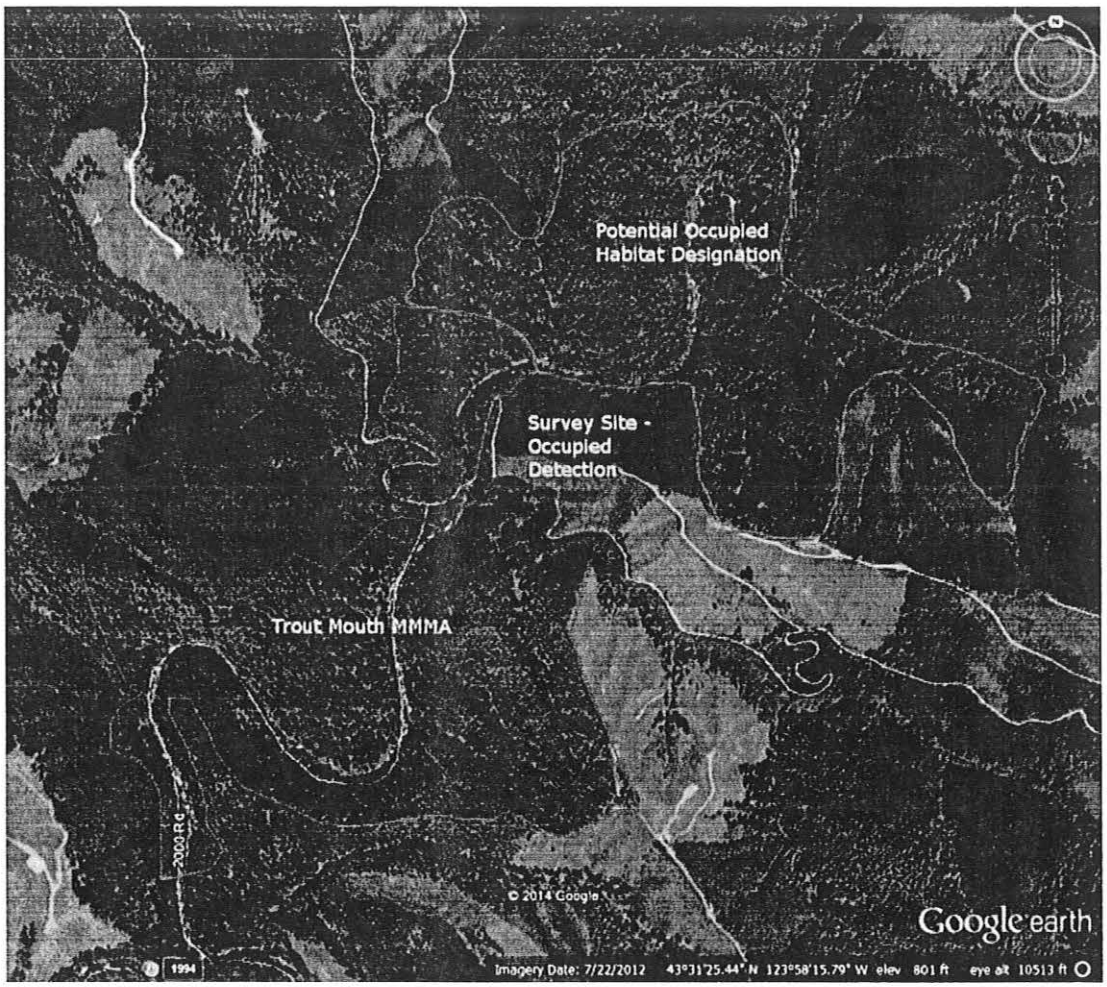
Rhett Lawrence
Oregon Chapter, Sierra Club
1821 SE Ankeny St, Portland OR 97214

Doug Heiken
Oregon Wild
P.O. Box 11648, Eugene, Oregon 97440

Joseph Patrick Quinn
Umpqua Watersheds
P.O. Box 101, Roseburg Oregon, 97470

Attachment 1:
Volunteer surveyors with Coast Range Forest Watch documented murrelet occupancy adjacent to the Trout Mouth MMMA along the Millicoma River. The continuous habitat from these results should be designated as a MMMA in the 2015 AOP. Below is a map estimating potential occupied habitat from that detection.

T23S




T24S

R11 W