



North Coast State Forest Coalition

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To the Oregon Department of Forestry,

Thank you for considering the North Coast State Forest Coalition's comments on FY2018 Annual Operations Plans for the Tillamook, Astoria, and Forest Grove Districts. We appreciate the time and care that went into these AOPs and would encourage Salem and district staff to engage us regarding any of our remarks below. Several remarks are similar or identical to those made by our Coalition regarding previous AOPs and reflect ongoing themes in the yearly plans that we would like to see addressed.

General comments regarding all three districts:

- One of the overarching themes in this year's AOPs is **decreased service levels** as part of an effort to achieve a reduction in the State Forests division budget. This follows a year in which state forest timber sales generated a **record high in revenue**. If record revenue levels coincide with a need to reduce the budget and decrease service, that seems to indicate something structurally wrong with the way that the division is funded. For several years, our coalition has actively advocated for a change in that structure, specifically supporting ODF's Recreation, Education, and Interpretation Policy Option Packages as a way to diversify revenue. Unfortunately, those efforts have not come to fruition. We believe that the Department needs to look more aggressively for a fix to this problem. So far, the problem has not been articulated as an inherent, structural one by the Department.
- Among the ramifications of the decreased service level is reduced "reforestation activities such as, reducing planting species that require expensive tubing protection and maintenance." It is very concerning that **species diversity will be decreased** in reforestation. As the Astoria District AOP notes, "Forest health strategies within this program focus on a diverse composition of tree species to provide stability and resiliency to the forest and emulates a natural species mix for the region. Implementation...can minimize the levels and severity of pest outbreaks, while diversifying the forest both structurally and compositionally."
- The amount of **aerial pesticide application** is troubling. Pesticide drift can cause public health problems and pesticides that find their way into waterways degrade water quality for humans and aquatic wildlife. These AOPs indicate that site preparation and vegetation management will require *over* 5,000 acres to be sprayed, much of it aerially. For public lands, this is unacceptable. If the application of pesticides is necessary, drift can be minimized by on-the-ground application, as opposed to aerially. We encourage ODF to explore this option.
- The extensive **road network** across all three districts continues to grow. The AOPs indicate a net increase of 31.4 miles to the already dense road network. While road improvement is welcome, we believe that the road network should be reduced to improve watershed health. High road density has been shown to contribute to habitat degradation. The density on private land holdings in these watersheds is also very high and ODF holdings should mitigate for the private road network. Furthermore, an ever increasing road network footprint decreases land for marketable timber.
- It is disappointing that the FY2018 AOPs only support base level maintenance of existing **recreational infrastructure** due to budget constraints. This includes, "There will be less services provided to the public during summer operations. The service reductions will be seen in less garbage service and 'pack it in pack it out'".

A coalition of conservation and fishing groups working together for a balanced plan to protect the
Tillamook and Clatsop State Forests' natural legacy

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emphasis; less trail maintenance and less service to dispersed campsites due to fewer staff; and delay in project completion.” Our coalition will continue to advocate for supplemental financial support and alternative revenue sources for important recreation programs and we urge the Department to do the same.

- It is welcome to see no planned clearcuts in **Terrestrial Anchor Sites**.
- All three districts note extensive plans for **mountain beaver** trapping. We understand the importance of protecting young trees. The Forest Grove District remarks that mountain beaver populations have greatly increased and damage to young stands is at a historical high. It may be beneficial to examine the causes of this population increase rather than only focus on trapping.
- We encourage the Department to support the **Salmonberry Trail project**, but we would request that the Salmonberry conservation commitments and their promotion be a priority.
- We urge you to take seriously and follow the recommendations in the **ODFW Biologist Review**.
- Why do some pre-ops specifically direct **green tree placement** in or adjacent to RMAs and/or within GTAs if this practice offers minimal value to wildlife?

Comments specific to Astoria District operations:

- We echo the Oregon Department of Fish & Wildlife Biologist Review in raising these concerns:
 - Why are strategies for snag standards not specifically mentioned in the AOP, especially when conditions indicate that most stands are not meeting FMP standards? (Astoria District)
 - Why are strategies for down wood standards not specifically mentioned in the AOP, especially when conditions indicate that most stands are not meeting FMP standards? (Astoria District)
- Of special concern is the amount of layered stands with larger diameter trees that are proposed to be clearcut. We echo the ODFW Biologist in encouraging clearcuts to be focused in stands that do not provide high quality wildlife habitat.
- A number of clearcuts (Long Walker, Popeye, Hawkeye, Daisy Chain, Cole Soap, Harkin Larkin, Sassy Sally) are proposed in stands between \approx 80-95 years old. This is severely disconcerting as these stands are some of the closest that we have to providing rare older forest habitat on the north coast. Also troubling is the number of sales that do not indicate stand ages. Both the Tillamook and Forest Grove District AOPs include stand age estimates for all operations.

Comments specific to Forest Grove District operations:

- There is no Department of Fish & Wildlife Biologist Review in Appendix C. Has a review taken place?

Sincerely,

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Tom Wolf, Oregon Council of Trout Unlimited
Bob Rees, Northwest Guides & Anglers Association
Ian Fergusson, Association of Northwest Steelheaders
Bob Van Dyk, Wild Salmon Center
Greg Haller, Pacific Rivers
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