



Comments on the Coos District 2012 Annual Operation Plans

May 25, 2011

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From: Cascadia Wildlands, Center for Biological Diversity, Klamath-Siskiyou Wildlands Center, and Oregon Wild. Contact information is on the last page of these comments.

Please consider these comments in your final decisions for the Coos District 2012 annual operation plans. Some of our concerns detailed in these comments include:

- * clearcutting around MMAs of insufficient size;
- * clearcutting spotted owl habitat while barred owl numbers are increasing;
- * releasing greenhouse gasses and increasing global warming;
- * no recreation budget for 2012;
- * degrading wetlands.

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1. Marbled Murrelets

The 2012 proposed timber sales continues with a lack protections for marbled murrelet management areas. In recent years the ODF has designated new Marbled Murrelet Management Areas (MMMA) of only a few acres. For instance, the murrelets found in the 2011 Millicoma Lookout timber sale resulted in the Millicoma Strawberry MMMA of only 22 acres¹. Last year we complained that the ODF was clearcutting around the eastern half of this small MMMA. This year the Three Buck Joe sale clearcuts around the other half. The ODF must reconsider this unacceptable impact to marbled murrelets.

MMMA's like Millicoma Strawberry do not protect the occupied site because they contain virtually no interior habitat, allowing predation of the nest, the number-one cause of murrelet nest failure.

Three documents from ODF outline the procedures ODF must follow in designating and managing marbled murrelets: the MM Operational Policy, the MM Operational Procedure, and the MAMU Guidance

The Marbled Murrelet Operational Policy:

Tiny MMMA's violate the State Forests Division Operational Policy on Marbled Murrelets,² designed to “avoid direct take of marbled murrelets, and minimize the risk of any potential take incidental to management practices...” (1.1.1.0).

The Operational Policy requires: “In marbled murrelet occupied sites, *maintain habitat suitable* for successful nesting.” (1.1.2.2). MMMA's that are too small, with most acres in edges prone to predation, with virtually no safe interior habitat, are not “habitat suitable for successful nesting.” The small MMMA's also do not comply with section 3.16:

“Design a marbled murrelet management area to maintain habitat suitable for successful nesting around occupied sites prior to operating in the vicinity of such sites...”³.

Predation from corvids is due to a lack of interior forests and is the most common reason for murrelet nest failures. If the ODF insists there is sufficient interior habitat in MMMA's that are being clearcut next to, then the ODF should disclose exactly how many acres of interior habitat are within each MMMA. The ODF has never done this, despite our repeated requests. Please disclose the interior-acre numbers now.

The MM Operational Policies require the ODF to “Document and retain decisions” for various activities required in the Operational Policies. We would like a copy of the “document and retain” decisions required from the following sections:

- * 3.4 are decision to waive survey requirements,
- * 3.14 are decision related to the annual review of survey results,

¹ The Common School Forest Lands Annual Report Fiscal Year 2009. Table 10, page 21.

² Marbled Murrelet Operational Policies #1.1.0. Revision 1.2. July 19, 2010. Oregon State Forests Division Operational Policy.

³ id. Page 3

- * 3.17 are decisions and materials regarding MMMA designations,
- * 8.1 lists Area Biologist decisions to be documented and retained,
- * 8.3 lists District Forester decisions that must be documented,
- * 8.9 lists Unit Forester decisions to be documented,
- * 8.4 states the MMMA documentation is maintained by the Staff Biologist

Please send this information to the Cascadia Wildlands address listed at the end of these comments. The Guidance requires the information to be digital, so please send them electronically, either to the mailing address on a CD, or emailed to francis@cascwild.org.

The Marbled Murrelet Guidance:

Tiny MMMA's also violate the State Forests Division, Marbled Murrelet Guidance Document,⁴ which says (page 15):

“The MMMA also should include a buffer to the likely nesting habitat (see 1.1.G1.5.1) where appropriate. The purpose of the buffer is to maintain the integrity of the occupied stand from windthrow or other environmental disturbances, as well as to provide protection from potential predation. Several studies have noted a relationship between the distance from an edge and nest success. Researchers have found that nests located further from stand edges (at least 170 feet or 50 m from the edge) are more successful than those located closer to stand edges, and that **nests 150 m (500 feet) from a stand edge were successful** or failed from reasons other than predation (Raphael et al. 2002).”

The ODF should confirm that murrelet nests are 500 feet or more from a MMMA edge.

Tiny MMMA's, such as the Millicoma Strawberry MMMA also violate the Guidance for Designating MMMA's, page 15:

“Topography is a key consideration for determining MMMA boundaries. Ridges provide environmental buffering of occupied sites as well as functioning as easily located operational boundaries. Streams also provide easily located operational boundaries and may make sense as boundaries especially if there is a change of habitat type at the stream buffer boundary.”

Many of the small, new MMMA's do not tie into geographical features.

Motorized recreation and camping is not recommended within MMMA's, yet the Millicoma Strawberry MMMA has a high-use OHV road through it, and is near an Off Highway Vehicle (OHV) campground. That campground is actually within the heart of another recently designated tiny MMMA, the Elkhorn Ranch MMMA, less than a mile south of the Millicoma Strawberry MMMA.

Motorized recreation occurs all up and down road 8100 through these two MMMA's. One MMMA contains the OHV campground, and the other MMMA is an area not drivable by most vehicles, so is especially popular with OHVs.

The Elkhorn Ranch MMMA has a campground established right in the middle of it, used mostly by OHV campers, but also by families. The OHVs have built several mud baths

⁴ State Forest Division, ODF. Marbled Murrelet Guidance. July 2010. page 15.

in the campground to drive through. Trash abounds in the campground because ODF seldom does littler pick-up. Trash attracts corvids, which predate on the murrelets trying to co-exist with motorized recreation and the clearcut edges. The Millicoma Strawberry MMMA has road 8100 through it, with nearby user-created motorized trails built through the forest.

The State MM Guidance says that two of the three recreational activities of concern to murrelets are “Motorized trail riding”, and “Dispersed campsites and trailheads, which attract corvids due to waste and trash”.⁵ The Guidance warns on page 20:

“motorized trails and target shooting do pose a large noise impact for short time periods. Dispersed campsites and trailheads are a risk to murrelets in that these sites may attract corvids known to prey on murrelets. Review of these recreational facilities should occur as part of the end-of-the-year reviews of survey data and new designations of MMMA’s.”

Has the ODF done the required review of these recreational facilities for impacts to the MMMA’s designated over them? The Review should include (page 20):

“Inventory where trails exist within designated MMMA. Consider closing established trails in a MMMA during nesting season. This decision will be made in review with the Area Biologist and considering topographic features and level of use. Consider permanent closure of trails located in a MMMA. ... Inventory dispersed campsites within MMMA boundaries. Consider regular monitoring and cleanup during the nesting season for established dispersed camping sites, as well as the installation and regular maintenance of signs discussing murrelet concerns. Consider closing dispersed sites depending on remoteness (for waste management) and use level of the site....”

Has the ODF considered any of this, or done any of this, to protect the Millicoma Strawberry or Elkhorn Ranch MMMA?

Yarding (or road building) through MMMA’s is also not consistent with 1.1.G1.5 Guidance for Protecting Occupied Sites. Page 16 states:

“In general, management activities in MMMA’s need to be consistent with the overall policy objectives of maintaining habitat suitable for successful nesting...”

The 2012 AOP includes the Three Buck Joe timber sale where Area 3 will be yarded up to the 9360 road, which means a yarding corridor has to be put through the Millicoma Strawberry MMMA. The AOP for Three Buck Joe should have publically disclosed this important information, and discussed the environmental impacts to this already too-small MMMA from a yarding corridor. The ODF should also do a Biological Assessment considering the impacts from clearcutting all around this MMMA as well as putting a yarding corridor through it⁶.

⁵ State Forest Division, ODF. Marbled Murrelet Guidance. July 2010. page 19.

⁶ A Biological Assessment is required by the Oregon State MAMU Operational Policy, July 2010, 3.19: “The Area Biologist will prepare a biological assessment at Unit Forester request, prior to management activities occurring in a MMMA.”

Last year we asked the ODF to send us the murrelet survey information showing the 2007 and 2008 survey station locations for Millicoma Lookout, and where the occupied area is so we can track if the Millicoma Strawberry MMMA is centralized over the occupied area. The ODF failed to respond to that request. We re-ask this year since the Three Joe Buck timber sale will clearcut around the west side of the MMMA.

Finally, the ODF has a web page detailing a MMMA monitoring program:
http://www.oregon.gov/ODF/STATE_FORESTS/Marbled_Murrelet_Management_Area_Habitat_Monitoring.shtml. How is this program progressing?

2. Spotted Owls

The ODF plans to clearcut 517 acres of spotted owl habitat in the 2012 AOP. This is excessive, especially since there is no finalized FMP or 10-year Implementation Plan for sales offered after 1/1/12.

In the 2012 AOP, **4 sales are “within a NSO Provincial Circle or Home Range”⁷**. Included is:

- * Marlow Merriment, near the Marlow Ridge owl pair and Marlow Creek site.
- * Otter Pop, near the Otter Creek owl pair.
- * Salander Forks, near the Salander Creek site
- * Three Buck Joe, right within the Shake Creek owl site.

The ODF should drop these 4 sales. Clearcutting in and near these sites could encourage more barred owl use and make these areas unusable by spotted owls.

Logging within a NSO Provincial Circle or Home Range is in conflict with the HCP, page IV-41, which says:

- “Harvest scheduling will defer stands that meet the following criteria as long as suitable substitute areas are available:
- * Stands with spotted owl occupancy,
 - * Stands in the 100 year age class or older that meet medium to high quality habitat standards for marbled murrelet nesting habitat [this applies even after the MM ITP expired],
 - * Stands closest to high quality marbled murrelet potential nesting habitat, northern spotted owl activity centers, and HCAs.”

Most of the 2012 sales are over 100 years old and meet medium to high quality habitat. Most sales are also close to murrelet potential nesting habitat, activity centers, and HCAs.

The ODF should disclose how close to spotted owl sites the 2012 logging units are. In the past, the ODF kept the approximate NSO site locations a secret. This has the appearance of secret negotiations when logging spotted owl habitat. All other land management agencies, such as BLM and the Forest Service, disclose the approximate location of near-by spotted owl sites, showing them on a map in relation to proposed

⁷ Individual AOPs, section VIII

logging units. The ODF, on the other hand, only discusses these issues in secret, with no opportunity for the public to oversee ODF's decisions on what could harm, or not harm, spotted owl sites on the Elliott. Before ODF approves the 2012 logging plans, the ODF should release this information to the public, such as a map with spotted owl sites, the site status, the acres of suitable habitat within the home range, and the location of logging units in relation to the home range.

The ODF has claimed that spotted owl population has increased from 2003, as found in the 2010 spotted owl surveys.⁸ While we hope that is true, we are cautious about the 2010 Survey results, which also found that the owl population could NOT have increased on the Elliott. This survey found an increase of 4 owls more than the 2003 survey⁹. However, the Survey results themselves say "The 2010 estimates may be overestimated since some responses that were considered a new site may actually be from birds whose sites had shifted, possibly due to effects from barred owls."¹⁰

Before the ODF depends on the 2010 survey to clear logging sites in the 2012 AOP, the ODF should explain some of the discrepancies we found.

Only 12 pair sites with an actual pair of owls were found and listed in Table 3. The text of the report states that only 8 pairs were found¹¹. There are only 22 historic owl pair sites, many long since abandoned, on the Elliott, listed in Table 3. For an unknown reason the summary says 23 historic pair sites exists. The Summary says 16 sites were abandoned (AB), yet table 3 lists 17 abandoned sites. The text, page 6 confuses matters more by saying there are 15 abandoned sites.

Other confusion exists in the 2010 survey listing of two new owl sites with no site numbers. This includes Otter Creek, and the Upper Salander Creek site¹². Since these sites are within ½ mile of other established sites, they received no site number because they are likely alternative sites to other established sites. Other double counting of sites could have occurred. For instance, the male of the Scholfield Creek owl pair "may be been the same bird found in Dean Creek"¹³. The Upper Mill Creek site is the same as the Tom Fool site¹⁴. The Upper Roberts Creek owls were displaced by barred owls, and are now counted at the Roberts Creek pair site¹⁵.

One of the most alarming facts to come out of the 2010 NSO survey on the Elliott is that not one owl pair nested. The same was true for the 2003 survey. It appears that conditions on the Elliott are not conducive for nesting. This means the ODF must reconsider their no-take strategy proposed for the new FMP, or reconsider the 1995 HCP if it is to continue.

⁸ Coos Annual Report 2010. Page 7.

⁹ Final Report. Northern Spotted Owl Surveys on the Elliott State Forest 2010. Page 7. There were 25 owls found in 2003, and 29 in 2010.

¹⁰ Final Report. NSO Surveys on the ESF 2010. Page 7.

¹¹ Final Report. NSO Surveys on the ESF 2010. Page 8.

¹² Final Report. NSO Surveys. Otter Creek MSNO pending, page 22

¹³ Final Report. NSO Surveys on the ESF 2010. Page 25.

¹⁴ Final Report. NSO Surveys on the ESF 2010. Page 27.

¹⁵ Final Report. NSO Surveys on the ESF 2010. Page 27.

The Salander Forks and Three Buck Joe sales are “Wildlife Habitat Focus” sales. The FMP requires that the logging prescriptions in this land allocation focus “on a high level of creating and maintaining forest structure and wildlife habitat, with a moderate level of wood production. This perspective will favor species that prefer older forests...”¹⁶ The prescription for these sales fails to do this.

The 2012 AOP has a confusing description of “Wildlife Habitat Focus”. It includes the definition for “Wood Production Focus”, which includes prescriptions that “focuses on a high level of wood production, with a moderate focus on creating forest structure and managing wildlife habitat”. However, that definition does not apply to the “Wildlife Habitat Focus”, which focuses on wildlife habitat, with a moderate level of wood production. (1995 FMP page V-37). Clearcutting these units, two or three more leave trees, do not focus on wildlife habitat with only a moderate level of wood production.

The desired future condition in the 2012 Wildlife Focus sales is “to provide early successional habitat”. The Wildlife Habitat Focus prescription should instead provide for wildlife that prefer older forests, such as spotted owls. These two sale prescriptions must be changed to comply with the Wildlife Habitat Focus prescription described in the FMP.

The timelines contained in the FMP on page V-37, for the 75-year rotation, is in conflict with its definition for Wildlife Focus. The FMP requires stands from 40-50 years old to be designed “to develop stand structure” for the Wildlife Focus, but 15 years later, to clearcut the structure. This conflicting information for “Wildlife Habitat Focus” is an error in the FMP. To resolve this error, the ODF should simply focus on Wildlife Habitat in a Wildlife Habitat Focus unit and “favor species that prefer older forests”. Clearcutting them at 75 years old does not make sense.

Barred Owls: Barred owls were found at 31 former NSO sites on the Elliott in 2010.¹⁷ In the 2008 **Spotted Owl Recovery Plan**, the FWS says that barred owls are a major threat to the spotted owl, and that “Based on the best available scientific information, competition from the barred owl (*S. varia*) poses a significant and complex threat to the spotted owl.”¹⁸ There is no uncertainty associated with the effect of the barred owl on the northern spotted owl.

The threat posed to the spotted owl by the barred owl is part of the cumulative impacts that ODF must evaluate when considering the impacts of logging. Recovery Action 32 is one of the most important recommendations for non-federal lands, especially non-federal lands that are coping with barred owls impacting spotted owl reserves.

Recovery Action 32: “Maintain substantially all of the older and more structurally complex multi-layered conifer forests on Federal lands outside of MOCAs....
Encourage maintenance of forests with these conditions on non-Federal Lands.”

¹⁶ Elliott FMP 1993. V-23 and 2011 AOP page 5.

¹⁷ Final Report. NSO Surveys on the ESF 2010.

¹⁸ Final Recovery Plan for the Northern Spotted Owl. FWS. May 2008.

The Oregon Department of Forestry's 2012 AOP does not attempt to follow this recovery action. Structurally complex, multi-layered Douglas fir forests are instead proposed for clearcutting. This violates the spirit and intent of the spotted owl recovery plan. The ODF must respond to this comment to let the public know its intent on following the recommendation of the NSO recovery plan.

3. Herbicides

The 2012 AOP summary documents the ODF plans to aerial spray herbicides on 440 acres for site preparation, aerial spray herbicides on 60 acres for vegetation release, and spray 125 acres of chemicals in a hack and squirt ground application, for a total of 625 acres that will receive chemical herbicides. Over 50 miles of roadsides will also be sprayed.¹⁹

As we have stated elsewhere in these comments, this level of chemical use is expensive, uses fossil fuel-based herbicides increasing ODF's annual carbon footprint, and causes the ODF to have to kill thousands of mountain beavers by removing their preferred food source. Chemicals could also harm tree planters who have to work in sprayed units, as well as people living near to, or recreating in the Elliott.

Typically, ODF aerial sprays Arsenal, Atrazine, Garlon, Glyphosate and 2,4-D. These chemicals have detrimental cumulative impacts on the watersheds, salmon, wildlife and people, even when the label instructions are followed.

On April 29, 2011 people living in a Coast Range community north of the Elliott testified to the Board of Forestry. Their homes were near industrial forests being sprayed with the same chemicals as used by ODF on the Elliott. Twenty-one of them had had their urine professionally tested, and all of them, including the children, tested positive for significant levels of 2,4-D and atrazine in their bodies.²⁰ To have 100% of these Coast Range residents test positive is unusual. 2,4-D and atrazine is usually found in just 2 to 4 percent of the general population. Samples from the residents were taken during the winter before spring spraying began, and some residents submitted a second sample after helicopter spraying occurred near their homes. The second samples showed an increased amount of the herbicides.

"Day Owen, for example, showed a 31 percent increase in the amount of 2,4-D and a 129 percent increase in the amount of atrazine in his urine between the first and second tests. His neighbor Eron King had a 54 percent increase in 2,4-D and a 163 percent increase in atrazine between the two tests. Her two sons also tested positive for the weed killers."

"We found out just two days ago, virtually 100 percent of us have atrazine in our urine. Imagine what it feels like to be told that," Day Owen said.²¹

¹⁹ New HCP DEIS 8-08. Page 3.1-10

²⁰ Eugene Register Guard. 4-30-11. <http://www.registerguard.com/web/newslocalnews/26188139-41/barr-board-residents-herbicides-state.html.csp>

²¹ Eugene Register Guard. 4-30-11. <http://www.registerguard.com/web/newslocalnews/26188139-41/barr-board-residents-herbicides-state.html.csp>

This is the testimony from people who can speak to the Board of Forestry. The fish and wildlife on the Elliott, as well as prisoners, campers, and neighbors working and living in and near the Elliott, have not been able to have their urine tested and complain about being contaminated. The ODF should cut back on herbicides because it is the safe and economical thing to do.

There is clear evidence that herbicides are detrimental to salmon, wildlife and people. Mixed with the herbicides are surfactants such as diesel and other chemicals.²² When these chemicals are aerial sprayed during the wet season, they are sprayed right into the water flowing down small headwater streams, unseen-from-the-air, that flow downstream to fish-bearing streams.

“The industry claims that glyphosate is safe for people and breaks down rapidly and harmlessly in the environment. But a large and growing body of scientific research challenges these claims, revealing serious health and environmental impacts. The adjuvants (added ingredients) in Roundup increase its toxicity. Harmful effects from glyphosate and Roundup are seen at lower levels than those used in agricultural spraying, corresponding to levels found in the environment.... A recently published study links glyphosate exposure to birth defects.”²³

In ODF’s response to our herbicide comments last year, they pointed us to a 2000 study, now over a decade old. The ODF should update their chemical education.

Even if label directions are followed, herbicides can have insidious effects. Studies of farmers and other people exposed to glyphosate herbicides have shown that this exposure is linked with increased risks of the cancer non-Hodgkin’s lymphoma, miscarriages, and attention deficit disorder and Parkinson’s disease. Glyphosate herbicides caused genetic and immune system damage in fish. In frogs, glyphosate herbicides caused genetic damage and abnormal development. Herbicides are meant to kill and cause nerve and hormonal damage.

Chemical labels often require pilots to fly low to the ground in low-wind and no-moisture conditions. That is almost impossible in the Coast Range. There is also the additional problem that spraying occurs in the morning when cooler denser air is flowing down the mountain, and conditions at the ridge top are often different from those at the bottom, making it more likely to contaminate lowlands. It is likely label requirements cannot be met anyway. The labels of these chemicals were based on trials in the 1990s using aircraft flyover flat lands in Texas. The labels lack specific instructions for steep slopes.²⁴

The ODF implies they are dependent on these petroleum-based herbicides to establish

²² New HCP DEIS 8-08. Page 3.1-10

²³ GM SOY. A summary of scientific evidence showing that genetically modified soy and the glyphosate herbicide it is engineered to tolerate are unsustainable...”. Antoniou. September 2010

²⁴ Information in this paragraph was gleaned from a Eugene Register Guard article dated 1-2-11.
<http://special.registerguard.com/csp/cms/sites/web/news/cityregion/25051060-41/kohlman-drift-oregon-herbicide-herbicides.csp>

plantations. Herbicides are used “where it makes economic sense to help establish new fast-growing stands of trees.”²⁵ In reality, other ways are as cost-effective. When the federal agencies do regeneration harvests, they do not use herbicides in the clearcuts, and their regeneration is good enough. The money and environmental degradation ODF could save would be significant. One of these years, the ODF should just consider the possibility of not using so many chemicals.

Integrated Pest Management (IPM):

The 2012 AOP is tiered to the proposed new Forest Management Plan (FMP) which requires the ODF to use *Integrated Pest Management* (IPM) as an alternative to using exclusively chemicals when dealing with noxious or non-native plant control and vegetation release operations.

However, the 2012 AOP fails to use IPM. The only time IPM is mentioned in the text is in conjunction with non-native plants, page 15:

“...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.”

However, in Table 6, the AOP says \$0.00 will be spent on noxious weed control. The ODF will not use IPM or chemicals. So the only time IPM is mentioned in the 2012 AOP, it is irrelevant.

4. Mountain Beavers

The 2012 AOP says:

“1,105 acres of mountain beaver trapping is planned at a cost \$38,675. 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 2012 AOP.”



The 2012 AOP proposes to clearcut harvest 517 acres. Why are twice these acres having mountain beaver removed?

We object to this practice. Bobcats, coyotes, large owls, cougars and bears eat mountain beavers. Killing 3,000 mountain beavers annually removes a food source for these larger mammals. Mountain beavers also serve an important function in nature owing to the amount of soil they move and the number of vacant burrows they leave behind for other wildlife. Over time, their old nests, partially filled food pantries and toilets, are buried well below the surface, where the vegetation and droppings become fertilizer.²⁶ These mountain beaver ecological services were unacknowledged by the AOP. The ODF should

²⁵ ODFs Response to our 2011 comments. Page 75.

²⁶ http://wdfw.wa.gov/wlm/living/mtn_beavers.htm

at least disclose the cumulative impacts of killing mountain beavers for decades.

In response to our comments from last year, the ODF wrote:

“Approximately 3000 mountain beavers are trapped a year, allowing the successful regeneration of planted stands. The Elliott has an abundant population of mountain beavers.”²⁷

How has the ODF determined there is an “abundant population”? Are their population numbers monitored? A species of mountain beaver in California is considered endangered²⁸. If ODF continues to kill over 3,000 a year, in addition to the killing done by private industry, the same could happen in Oregon.

It only makes sense that if ODF kills 3,000 mountain beavers a year, on about 1,000 acres, the mountain beaver population will decrease over time, especially with the cumulative impacts of the adjoining 209,000 acre Weyerhaeuser Millicoma Tree Farm. If the population has not decreased, perhaps the surviving mountain beavers produce more offspring in response to trapping, which makes trapping useless and expensive.

Kill trapping of mountain beavers is done using Conibear No. 110 traps set in main burrows. “This trap is sometimes not immediately lethal because of the mountain beaver’s thick short neck”²⁹. The ODF should disclose how many time a beaver is not killed in the trap, an estimate of how long it was been trapped alive, and what method was ultimately used to kill it.

The ODF should disclose what other wildlife is caught in traps. How many non-target species are found and what is their fate. The USDA finds that “Trapping may take nontarget species such as weasels, spotted skunks (*Spilogale putorius*), mink, squirrels (*Tamiasciurus* spp.), rabbits, and hares that use the mountain beaver burrows.”³⁰ The ODF should disclose what non-target species mountain beaver trapping kills.

The ODF should consider alternatives to kill-trapping mountain beavers, like not removing the beaver’s entire preferred food source with chemicals. Studies have determined that mountain beavers are less likely to damage trees when other preferred food sources are available. They do not prefer tree seedlings. They prefer salal, ferns, huckleberry, and salmonberry to conifer seedlings when both were provided in ample quantities³¹. If the ODF didn’t herbicide spray, stripping the forests of all vegetation except conifer seedlings, ODF wouldn’t have to kill the mountain beavers. A USDA recommendation is to: “Use caution when applying herbicides to avoid causing increased feeding pressure on conifers by suddenly removing the availability of other forage

²⁷ ODF’s 7-29-10 response to Cascadia Wildlands comments. Page 6.

²⁸ id. Page B56

²⁹ Mountain Beavers. Dan L. Campbell, Olympia Field Station, Denver Wildlife Research Center, USDA-APHIS Animal, Damage Control, Olympia, Washington 98512. Page B-58.
http://icwdm.org/handbook/rodents/ro_b53.pdf

³⁰ Id page B-59.

³¹ www.wfpa.org/pdf/fyi/FYIMountainBeaver.pdf.

plants.”³² “...where red huckleberry was abundant, mountain beaver damage to Douglas fir was insignificant.”³³

Clearly, there are alternatives to not only reducing death and suffering to native wildlife, but to reduce the ODF cost and increase revenue to schools. In just 9 years (2004 through 2012), the ODF has spent over a half a million dollars, \$557,415.00, on killing all of the preferred food mountain beavers eat, and then killing mountain beavers.³⁴ The district employee cost is not included in this figure.

In just 2012, the site prep costs (eliminating the preferred food choice for mountain beavers) and killing mountain beavers, cost \$78,275.00, plus the Oregon state employee time to oversee these projects. That would be over \$80,000, maybe over \$100,000 extra dollars that could go to Oregon schools instead. Couldn't Coos Bay schools use an extra \$100,000 a year? And ODF could have a more wildlife-friendly, greener AOP that even reduces carbon emissions.

5. Recreation

Unlike past AOPs on the Elliott, this year the ODF budgets no money toward recreation, claiming, “There is very little formal recreation management on the Elliott State Forest”.³⁵ We disagree. People enjoy camping on the Elliott. For instance, when we visited the Three Buck Joe timber sale in late May, a family was camped in the camping area across the river from the Elkhorn Ranch sale. They told us how much they valued the Elliott for its beauty, and the Millicoma River for recreation, “just outside of town”. They were shocked when we told them of the new clearcuts proposed on either side of the camp³⁶ and the Elkhorn Ranch clearcut proposed for right across the river from the camp. Their response was that we might need to log, but clearcutting in this beautiful recreation area is not necessary. We agree. It is shameful how the ODF is targeting the 8100-road area, one of the highest recreation areas on the Elliott, with some of the heaviest clearcutting in recent years.

Recreation Budget: The ODF should continue to budget at least the \$5,000 allocated in past years to recreation. The ODF needs to finance the cleaning up of popular campgrounds, especially since no sanitation facilities are provided for campers. This cleaning is especially important because one of the biggest campgrounds is centered within the Elkhorn Ranch MMMA. Camp trash attracts corvids, the main predator of murrelet nests. The ODF also needs to finance the building of non-motorized hiking trails, as has been promised in past AOPs and FMPs. And most importantly, the ODF needs to finance mitigation of the damage caused by motorized recreation.

³² id. Page B57.

³³ id. Page B59.

³⁴ See AOP cost summaries for chemical site prep and for “Tree Protection-Direct Control”. Some of the older AOPs use “trapping” instead. Spreadsheet determining this figure is available upon request.

³⁵ 2012 AOP Draft Final Summary, page 15.

³⁶ Three Buck Joe to the north and Mr. Millipede to the south.

Motorized Recreation: Camping, hiking, hunting and fishing is a small component of recreation compared to the impacts brought by motorized recreation. Helping to encourage motorized recreation, every new road that is closed after logging remains available for Off Highway Vehicle (OHV) recreation. For instance, the new roads to be constructed in Otter Pop, Three Buck Joe and Minicoma “will be closed to traffic, with the exception of ATV’s, once the operation is complete.”³⁷

In response to our past comments, the ODF has claimed that motorized recreation is only a part of hunting, and not a recreation category in itself. In reality, OHV recreation on the Elliott, including ATVs, is prolific. For instance, OHV’s have dug themselves mud baths to play in, in the camping area off of 8100, next to the Millicoma River. OHVs have built numerous trails over the banks of the Millicoma River for access to play in the river. We have previously sent ODF pictures trucks modified into “rock crawlers”, driving up and down the Millicoma River, and pictures of the paths cut through the vegetation on the riverbank for OHV access. Yet every year, in response to our AOP comments, the ODF insists there is no significant OHV recreation on the Elliott. This year the ODF should change this attitude, not only for this AOP, but also for the new FMP this AOP will be implemented under.

Recently the pre-operation timber sale forms have changed for Elliott timber sales, so that now ODF has to specifically address motorized recreation in every timber sale. Number 10 of the pre-operation form is “Recreation Resources”, with a row for “Motorized Trails”. ODF must choose if a motorized trail is “In or Immediately Adjacent to the Operation” or within ¼ mile of the operation or on a potential haul road. In every single 2012 sale, the ODF indicated there were NO motorized trails anywhere – none at all. It appears the ODF either misunderstood this question, or is not telling the truth.

For instance, road 2328 through the Mister Millipede timber sale is heavily used by ORVs. It is a popular OHV trail, rutted and eroded. The bottom of 2328, at its intersection with 8100, is a muddy mess, right on the banks of the Millicoma River. Didn’t ODF notice that? Why wasn’t section “Recreation Resources” box for “Motorized Trails On the Anticipated Haul Route” checked YES in the Mister Millipede AOP?

Another example is the OHV trails in and through the Three Buck Joe timber sale. OHVs ford the Millicoma River just north and south of Area 3. Didn’t the ODF notice that? Along the northern edge of Area 3 there is a popular OHV trail cut into the forest going east, all the way to the boundary. Why wasn’t the box for “Motorized Trails” checked YES. It should have two YES checks, one for the “In or Immediately Adjacent to the Operation”, and the other YES check for “On the Anticipated Haul Route.

The ODF must begin to tell the truth about the high degree of motorized recreation on the Elliott. Evidence of damaging motorized recreation can be seen everywhere – driving up and down the Millicoma River, in camping areas (destroying all vegetation in some camping areas), on stream banks, over road blocks, etc.

³⁷ 2012 AOP Draft Final Summary. Page 13.

The ODF does nothing to promote a quiet, environmentally safe, non-motorized recreation, such as hiking trails. No hiking trails have ever been planned in this public forest. The ODF should explain why this is. In fact, our organization would like to find ways to construct one or more trails on the Elliott. Please respond to these comments by describing a pathway for that to occur.

6. Roads

The ODF proposes to build .5 miles of new roads, and improve 5.3 miles of roads, many of which are in a self-decommissioned state. ODF is not proposing to decommission (or vacate) any miles of existing roads.

Recently, the 9th circuit court has determined that ODF now needs to apply for a Clean Water Act permit under the National Pollutant Discharge Elimination System (NPDES) for all new roads on the Elliott, and for on-going approval of OHV use of the river system. Logging road operators (including local governments controlling logging roads) are required to apply to U.S. EPA for permits. This court ruling was in response to damaging logging roads in Oregon's Tillamook State Forest, so it clearly applies to the Elliott State Forest also.

Road ditches, culverts, and channels collect and discharge runoff that drains into nearby rivers, such as road 2328 through the Mister Millipede timber sale. The sediment "adversely affects fish... by smothering eggs, reducing oxygen levels, interfering with feeding, and burying insects that provide food", Judge William Fletcher wrote in the opinion.

The ODF cannot approve the 2012 AOP until those permits have been granted. The permit is also required for every OHV trail next to and into creeks and rivers that ODF continues to allow to exist.

7. Riparian Strategies

The AOP states, "The aquatic and riparian strategy from the Draft HCP and FMP has been adopted in this AOP".³⁸ This is alarming. These are the same riparian buffers and strategies that the 2010 Independent Multidisciplinary Science Team (IMST), and the National Marine Fisheries Service (NMFS) found to harm salmon.

The National Marine Fisheries Service (NMFS) found the Elliott's 2008 draft HCP strategies to be so inadequate to protect fish, they refused to give ODF an incidental take permit for coho salmon. NMFS cited stream temperature increases and a lack of wood delivery to streams, as the biggest problems harming salmon³⁹.

³⁸ Coos District 2012 Annual Operations Plan. Page 4.

³⁹ Letter from NMFS, July 21, 2009, to Jim Young, Coos District Forester, "RE: Elliott State Forest Habitat Conservation Plan."

The IMST Report also gave the Draft HCP Riparian Management Strategy poor grades, agreeing with the NMFS. For details of their report, see our 12/30/12 comments on the 2010 draft ESF FMP.

In summary, the Scientific Team found that the riparian strategy in the 2008 draft HCP was not based on the best available science: “The draft HCP and DEIS authors cited references that were not available for review. Workshop abstracts were cited that did not include sufficient detail... Others reported on research from regions very dissimilar to the Oregon Coast Range.”⁴⁰

The Science Team felt the ODF gave too much “credence to studies that support narrower buffers.... The effectiveness of narrow, streamside retention buffers in moderating stream microclimate from harvest effects is questionable”.⁴¹ The Science Team further described ODF’s calculation of stream temperature to “be a problematic approach” and “may be weak”.⁴² For non-fish bearing streams (Type N) that feed fish streams, the Science Team found problems with ODF’s assumptions. “First, there is debate about the use of 80% canopy cover as a target for shade. Second, it is problematic to generalize that waters warmed by upstream exposure by harvest will cool simply by being shaded downstream.”⁴³

The Science Team found that ODF’s stream protection strategies to be “a convoluted series of assumptions and inferences, potentially rendering the approach subject to compounded errors or weaknesses of induction.”⁴⁴ They found the strategies used for large wood recruitment to “have scientific shortcomings”⁴⁵. The Elliott Watershed Analysis was also problematic because it had not “undergone scientific review”.

Concerning unstable, landslide prone soils common to the Elliott, the IMST found that ODF failed to “describe in detail how it plans to evaluate the risk of landslide, debris flows and harvest induced soil erosion to fish...”⁴⁶ They found that ODF’s conclusion of landslide risk “could be potentially misleading.”⁴⁷ Where ODF found the increased risk of landslide to be 2%, the Science Team found it to be 40%!

For the ODF’s analysis of forest roads, the Science Team “once again found a lack of hard data or analysis to support the findings of the DEIS”⁴⁸. They observed “that there are no data or characterization of the sediment inputs and hydrologic effects from new roads. This means we cannot determine the amount of mitigation needed to address any adverse

⁴⁰ Independent Multidisciplinary Science Team (IMST) Review of the Draft Elliott State Forest Habitat Conservation Plan and EIS (August 2008 drafts). State of Oregon. 10-6-2010. page 7.

⁴¹ IMST Review. 2010. page 9, citing Anderson et al. 2007 page 265.

⁴² IMST Review. 2010. pages 11 and 12.

⁴³ IMST Review. 2010. page 13.

⁴⁴ IMST Review. 2010. page 14. Emphasis ours.

⁴⁵ IMST Review. 2010. page 16.

⁴⁶ IMST Review. 2010. page 20.

⁴⁷ IMST Review. 2010. page 22

⁴⁸ IMST Review. 2010. page 23

effects on fish and their habitats and therefore we cannot judge whether or not existing best management practices are sufficient to mitigate impacts.”⁴⁹

It is unfortunate for the fish and other riparian species that the 2012 AOP uses these same flawed strategies. Instead, the ODF should adopt scientifically adequate stream buffers, such as those found in the Aquatic Conservation Strategy of the Northwest Forest Plan, used by the federal agencies on forests adjacent to the Elliott State Forest.

The 2012 AOP Draft Summary states that a “Riparian Stream Temperature monitoring Project” has 33 active sites, 2 of which are located on the Elliott State Forest (page 18). Where are those two sites located?

8. Individual Sale Comments

Three Buck Joe

The ODF failed to describe how this sale would be accessed. The 8100 road goes through the middle of the sale, but cannot be used because there are no bridges over the Millicoma River, only river fords.

Therefore, it appears that Area 3, a 27-acre clearcut, will be yarded from the end of road 9360, in the Millicoma Lookout timber sale. Correct? If so, this means that a yarding corridor would go right through the Millicoma Strawberry MMMA. This MMMA is too small as it is, just 22 acres. With a yarding corridor adding to the edge effects of the clearcuts surrounding it, the MMMA will become unsafe for any murrelet nesting, rendering it a useless MMMA.

The AOP should have disclosed the yarding impacts of Three Buck Joe through the adjoining MMMA. Under Section VIII of the timber sale form, Other Wildlife Considerations, the ODF failed to disclose this important information. This section also asks: “Is the Operation within a Marbled Murrelet Management Area? YES NO”. The ODF checked “NO”, even though it seems likely that yarding will occur within the MMMA. The ODF should correct this mistake.

This sale includes a significant wetland that the pre-operation report failed to disclose.

The northeast border of Area 3 (27 acres) of Three Buck Joe borders the Area 1 (34 acres) of the Millicoma Lookout timber sale. There is a beautiful, natural wetland that straddles this border. Wetland grasses, forbs and other wetland vegetation cover an area of several acres in this flat, low land next to the Millicoma River. There are even large Sitka spruce trees here.



Wetland straddling Millicoma Lookout and Three Buck Joe timber sales. Timber Sale signs are along the western boundary of Millicoma Lookout area 1.

⁴⁹ IMST Review. 2010. page 24.

Under the pre-operation timber sale form, Section XIII, “Other Resource Considerations”, the ODF answered NO to the question: “Are there other resources present in or around this operation that need special consideration?” Did the ODF answer “no” because ODF does not consider a wetland to be an important resource? Or did ODF just not notice the wetland existed?

It seems unlikely that ODF didn’t notice the wetland because somebody from ODF had to get their feet wet posting the “Timber Sale” signs on the western border of Area 1 of the adjoining Millicoma Lookout timber sale. The Millicoma Lookout timber sale pre-operation report also failed to indicate there was a wetland within the sale boundary.

The ODF should respond to these comments with an explanation of why the wetland was not disclosed. Whatever the reason, the ODF must change the Millicoma Lookout timber sale boundaries to protect this important resource and wildlife habitat. Currently there is nothing in the Millicoma Lookout timber sale documents that requires protection of this important place. It appears ODF will just allow the wetland soils to be rutted and vegetation to be destroyed.

For the part of the wetland that is on Three Buck Joe proposed sale, the ODF must correct their misstatements in the pre-operation report now and fully buffer and protect the wetland from logging impacts.

Otter Pop

The Otter Pop pre-operation report description says the sale is located in range 10. This should be corrected to range 11.

There is a long new road in the Otter Pop sale, however, the pre-operation report failed to include a topo map of this sale, or even describe how steep a side-slope the new road would be built on. Please revise the report so this information and map is included.

Salander Forks

This is a 107-acre sale, next to existing clearcuts and proposed clearcuts, creating an opening greater than the 120-acre opening restriction of the Oregon Forest Protection Act (OFPA). Salander Forks is north of Salander Top, south of Big Salander, which is south of Little Salander. This combination of sales could create an opening that not only violates the 120-acre limit, but also creates a watershed with so much unrecovered canopy-loss that it contributes to peak flow increases into Salander Creek.

Timber sales lining the Millicoma River

In the last few years ODF has targeted the West Fork Millicoma River for clearcutting mature forests, with sale boundaries only 100 feet away from the river. In just three years, sales like Lower Deer, South Kelly Ridge, Stulls Ridge, Millicoma Cougar, Millicoma Meander, Millicoma Lookout, Minicoma, Otter Pop, Three Buck Joe, and Mister Millipede, all clearcut large acres to within just 100 feet of the river. This is a sudden and drastic impact to the watershed, and if fully implemented, will impact the river with sediment and peak flow increases. The ODF should be considering overall watershed

impacts in addition to local impacts documented in the pre-operations reports. There has been no watershed impact analysis considering the impacts of this level of clearcutting in this short time, on the Millicoma River.

9. Carbon

The ODF failed to consider carbon impacts in this year's AOP. The ODF did consider carbon for the 2011 AOP, so ODF should either add that consideration to the 2012 AOP, or explain why it is not included this year.

When we submitted comments on the Elliott State Forest AOP last year, we asked the Coos District to consider the plan's impact on carbon. It is important for the ODF to at least know what the district's carbon footprint is, and then explore ways to reduce impacts on global warming. The ODF has found that the capacity to store carbon in Pacific Northwest forests is among the highest in the world. In fact, it is even greater, per acre, than tropical rainforests. The ODF has also found carbon is still increasing in stands over 600 years old in Oregon.⁵⁰

ODF's first response failed to respond to our carbon comments. However, after some follow-up comments, the ODF did respond in a September 28, 2010 memo. There, ODF said they believe the carbon estimation we did in our 2011 comments was too high, and offered different calculations that considered more carbon storage in wood products and left on site.

Jim Young said: "ODF used the BLM eco classes to calculate carbon pools and to determine differences in pools for products pre- and post-harvest and for clearcuts and partial cuts. We also assumed that 50% of harvest residuals would remain on site and become part of the non-live tree pools, as part of standard operations and to meet management plan targets for downed wood and snags. **The result is that about 78,000 t would leave the forest...**"⁵¹

We accept ODF's calculation as an important step in addressing the role Oregon's forests play in climate change. ODF believes that, as a result of one year's forest management on the Elliott, 78,000 metric tons of carbon would be released into the atmosphere and contribute to climate change.

The 2011 carbon impacts ODF considered included:

- * Clearcut 549 acres of mature forests;
- * Thin 804 acres of mature forests
- * Fossil fuels in the logging, precommercial thinning, and chemical application.
- * Fossil fuel used in producing herbicides.

Is it correct that all these items were included in the 78,000 tonns? (If not, the ODF should reconsider the calculation, or explain why some fossil fuel use was not counted.)

⁵⁰ State of the Science Report, ODF, 2010.

⁵¹ ODF Memo, Jim Young, Coos District Forester, 9-28-10. Page 1. Emphasis ours.

We appreciate the effort the ODF made in calculating what ODF believes is the carbon footprint for one year's logging on the Elliott. We are disappointed that the ODF did not repeat that effort this year. Calculating your carbon impact should not be a one-year effort. It should be considered yearly in the Annual Operation Plans.⁵²

Last year, ODF responded to us by saying: "We recognize the increasing importance of greenhouse gases (GHG) and their potential effects on climate and the environment. As responsible stewards of Oregon's forests, in the future, we will pay attention to GHG effects of our operations to the best of our ability."⁵³ Thank you. Since you forgot to include this assessment in the 2012 AOP, please include it in the public response to these comments.

Last year ODF also said: "However, we currently do not have the resources to conduct detailed analyses of all of our operations." You did an acceptable job last year, estimating the 78,000 t of carbon impact from the 2011 AOP. If you had the resources to do it last year, you have the resources to do it this year, especially if you generate 10 million dollars revenue from the carbon stored in wood products. You are able to consider impacts to wildlife, to soils, to fish and clean water. Carbon impacts are just another resource for you consider in your plans⁵⁴.

Another step ODF should begin to include, after the carbon impacts are calculated, is to consider if there are any options to reduce that impact. If so, consider those alternatives in the AOP.

In your response to us last year, you stated that, starting in 2003, you were developing "tools to predict how forest management... affect forest carbon pools"⁵⁵. How is that coming along? It will be an important tool to implement Goal G in the latest "Forestry Program for Oregon" plans.

The 2011 edition of the Forestry Program for Oregon (including goals for the Elliott State Forest) includes Goal G: "Improve carbon sequestration and storage and reduce carbon emissions in Oregon's forests and forest products." This goal, that applies to management of the Elliott, states: "There is opportunity to increase carbon sequestration and storage in Oregon's forests", such as "extending forest rotations and increasing the size and complexity of forest structures". Another goal is to promote "increasing energy efficiency and reducing the use of fossil fuels in the Oregon forest sector". The ODF should consider these strategies for the Elliott, as required in the Forestry Program for Oregon.

⁵² It could be considered each decade in Implementation Plans, but for the Elliott, for 2012, it needs to be in the AOP since there is no IP.

⁵³ ODF Memo, Jim Young, Coos District Forester, 9-28-10. Page 3.

⁵⁴ See Figure 5 in the 2011 draft of the Forestry Program for Oregon. Carbon storage is on the same level as soil, water, ecosystem health, and economic benefits, when "measuring and discussing sustainable forest management."

⁵⁵ ODF Memo, Jim Young, Coos District Forester, 9-28-10. Page 4.

Goal G in the Forestry Program for Oregon states:

“Regardless of the type of management, we can expect a forest at one time or another to be serving as a sink, source or neither so the question is what is the net balance statewide or regionally in any given year.”

The *only* way to reach this goal is if ODF knows the carbon impact from management on each forest, including the Elliott. Therefore, the ODF must consider their carbon impact from the 2012 AOP. Goal G continues:

“Oregon’s Forest Sector... has opportunities to examine how wood products are harvested, transported, and manufactured to increase energy efficiency and reduce the use of fossil fuels.”⁵⁶

Now is the time for ODF to get with the Forestry Program for Oregon. You did it last year, you can do it again this year: estimate the carbon impact from the 2012 AOP.

ODF’s website states:

“By monitoring the carbon stored in Oregon’s forests and forest products, and how that amount is changing, we can learn how our policies and actions are affecting the amount of carbon stored by Oregon’s forestlands and forest products over time.”⁵⁷

Therefore, the ODF should measure the carbon impacts of each AOP, or provide a good explanation why not, in light of all the state recommendations to do so.

The ODF assumes that part of the 2012 AOP will be implemented under a new Forest Management Plan⁵⁸. That document confirms that carbon stores on the Elliott has a global significance:

“Recent analysis of older forests illustrate that carbon storage in many unmanaged landscapes is not at equilibrium, but rather is increasing (Luyssaert et al., 2008). A recent study in the Pacific Northwest has shown that the potential to store additional carbon in Pacific Northwest forests is among the highest in the world because much of the area has forests that are long-lived and maintain relatively high productivity and biomass for decades to centuries (Hudiburg et al., 2009).”⁵⁹

The new FMP (of which the 2012 AOP is a part of) also requires the ODF to “Maintain overtime a current account of carbon stored on the Elliott State Forest”⁶⁰, and to “Establish a carbon inventory for the Elliott State Forest”, and to “Establish baselines and calculate both long-term and intermediate outcomes for carbon storage based on forest management strategies”, and to “Determine net effect of management activities on carbon stocks.”⁶¹ If ODF does not calculate carbon impacts of the 2012 AOP, the ODF starts out by being in violation of the FMP in the very first year of implementation.

⁵⁶ All quotes from the Forestry Program for Oregon comes from the draft presented at the Board of Forestry 4-29-11 meeting, called “attach 04 recommendations.pdf” and can be downloaded from the Board of Forestry web site for this meeting.

⁵⁷ <http://www.oregon.gov/ODF/indicators/indicatorsG.shtml>

⁵⁸ Elliott State Forest (ESF) Forest Management Plan (FMP) April 2011. ES-11

⁵⁹ ESF FMP April 2011 page 2-18.

⁶⁰ ESF FMP April 2011 page 3-12.

⁶¹ ESF FMP April 2011 page 5-44.

All Oregon BLM districts and National Forests do a carbon calculation on each of their activities. Every timber sale Environmental Assessment uses a formula to determine how much carbon is released into the atmosphere through tree removal, soil disturbance, and logging equipment operating with fossil fuels. The calculation includes allowances for carbon stored in wood products and prorated over time to account for increased growth of retention trees and planted trees. They do this dozens of times a year. The ODF only needs to do this once a year.

This carbon calculation gives us a relative number for public land projects, and a good estimation of carbon cost or gain. In this way, the carbon impact is opened up for public discussion and opportunities to look at ways to reduce carbon loss, or increase sequestration. While the Elliott benefits school children today, it could be a much greater economic benefit to those school children in years to come if we can address the impacts of climate change from the Elliott today.

10. Forest Management Plan (FMP) has no Implementation Plan

The ODF intends to adopt a new Forest Management Plan, to be implemented beginning 1/1/2012. Sales advertised after 1/1/2012 will be implemented under the standards and guidelines of the new FMP. “A second FMP based on take avoidance strategies has been developed in case the HCP process is not successful. The aquatic and riparian strategy from the Draft HCP and FMP has been adopted in this AOP”⁶²

The latest draft we have of that FMP is dated April 2011. However, we have no 10-year Implementation Plan, required when a FMP is used instead of a HCP. The public is being asked to submit comments on these sales without having seen the applicable 10-year Implementation Plan (IP) for the new Forest Management Plan. In fact, the ODF should not even present details of an Annual Operation Plan based on a 10-year IP, without doing the IP first.

Because of this conflict, no sales in this 2012 AOP should be advertised after 1/1/2012 until the public has seen and commented on the full plans the sales are based on. After that public process is complete on the FMP and IP, we should again be allowed to comment on the sales released under those plans.

11. Section IV: Desired Future Condition

Section IV, Desired Future Condition/Vision, on the new timber sale forms, are confusing and appear to be incorrect.

Table 5 gives “HCP Habitat Information”. However, most of these sales will be advertised after 1/1/12 when the ODF plans to be compliant with the new Forest Management Plan, and hopes to have ditched the HCP. Why isn’t this section disclosing the Desired Future Condition as described in the FMP instead of the HCP? One example is that Table 5 gives us “Reserve Acres” for each HCP defined basin the sale is in. But

⁶² Coos District 2012 Annual Operations Plan. Page 4.

the Reserve Acres are lower under the FMP the sales will be implemented in, not the HCP.

Also in this section is a Yes/No question on if the operation will result in increased fragmentation of mature habitat, as if that is a concern for ODF. Indeed, out of the 8 timber sales proposals that clearcut forests, 5 - over half, fragment mature forests. When we've complained about the high rate of fragmentation in the past, the ODF responds that they've logged everything else, and they have no choice but to fragment forests now. So, if ODF believes it is allowed by the FMP and HCP, and that it doesn't really matter (since for several years in a row, over half of the sales fragment mature forests), why is that question even in the new form? By the way, we do believe that non-fragmenting logging choices ARE available to ODF if the ODF was not intent on just clearcutting mature forests. For instance, volume could be earned from thinning managed plantations, which would not fragment mature forests.

The 1995 HCP forbids fragmenting mature forests. "Timber harvest will be planned to minimize fragmentation" (HCP IV-36). "Reduce fragmentation within the forest." (HCP IV-2) "Harvest units will be located to minimize fragmentation of larger blocks of mature forest. As an example, units will be located on the edge of fragmented blocks, rather than in the middle of suitable habitat." (HCP IV-41).

In spite of this HCP requirement, most of the sales from the last 5 years fragment mature forests, while at the same time, thinning managed plantations is an option to not fragment mature forests the ODF refuses to consider.

12. Public Information:

Topo maps:

The ODF failed to provide the public with topographical maps of timber sale proposals. Topo maps give the public a wealth of information, such as how steep new proposed roads are, and what is the slope of proposed clearcuts near streams.

I was told that the ODF plans to no longer provide topo maps for public information. We object to this decision. The ODF has also stopped published maps of proposed timber sales on your web site. This gradual reduction of public information is without merit.

The ODF now uses LiDAR data to use in proposed timber sale, which provides rich topographical data. The recent CSFL Annual Report for the Elliott states that "Topographic data is an essential tool that ODF uses to manage forest land. LiDAR data is so much more accurate than the standard topographic data (USGS 1:24,000 quadrangles), that it allows a lot more work to be done in the office prior to field work. ... it is a great tool to help focus the field work on where it is most needed."⁶³

Our tax money is providing ODF with this tool. The ODF has no excuse to withhold the topographic maps from public use. The public monitors the ODF timber sale program on

⁶³ CSFL FY 10 Annual Report page 49-50

the Elliott. Since we are providing funding for this “great tool”, we should receive the benefits also. The ODF must again provide us with the topo maps of timber sales, and should again post the sale maps on-line.

Cost information:

The AOP fails to include the cost of the Coos District employee salaries to implement the AOP in Tables 4, 6, and 7. This cost could reduce the amount of money received by the Common School Fund. How much is this cost?

Other Requested information:

We have requested some additional information throughout these comments. Following is a summary of our requests:

- * Millicoma Lookout survey information showing murrelet survey station locations and finding results, with sufficient information for the public to confirm the Millicoma Strawberry MMMA is centered over the nest site.
- * Interior acres within MMMA provided for murrelet nests.
- * Documentation, decisions, and related materials regarding MMMA designation, as required by State Forests Program Operation policy page 3.13.

In Conclusion, please drop all timber sales that clearcut or thin in endangered species habitat. Concentrate timber sales in young plantations outside of reserves. Calculate your carbon impact and consider ways to reduce that impact. Eliminate wetlands from harvest units. Reduce chemical use and mountain beaver killings on the Elliott.

Sincerely

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