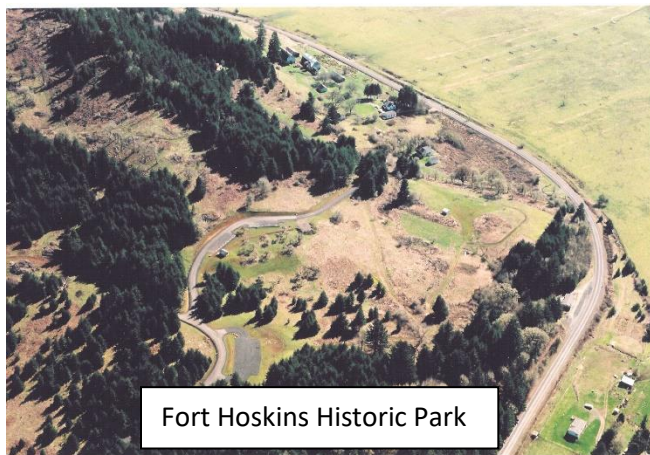
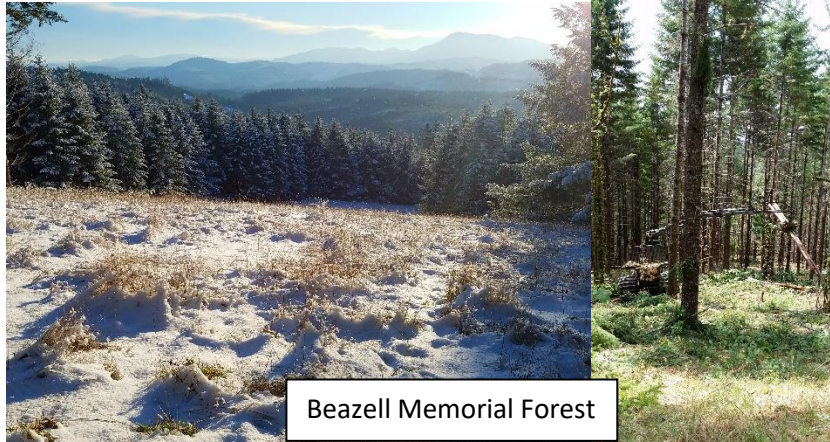


**Benton County Natural Areas, Parks, and Events Department**

**Forest Resource Stewardship Plan Update (2021-2030)**

**Final Plan Addendum**

**Public Comment Responses**



**Completed By: Benton County Natural Areas, Parks, & Events- Natural Resources Coordinator**

**2/26/21**

## Overview

From January 2020- February 2021, Benton County Natural Areas, Parks, & Events supervised and coordinated the work of Trout Mountain Forestry to complete the Forest Resource Stewardship Plan (2021-2030) update.

Benton County Natural Areas Parks Advisory Board directed staff to complete the following, after public comment period had closed on the plan update draft (2/16/21):

1. Compile, review, and respond to all public comments received during the public comment period. Public posting of responses provided on the county website here: <https://www.co.benton.or.us/parks/page/forest-resource-stewardship-plan-update-public-outreach>
2. Update plan to incorporate final changes (after all public comments are received) via plan addendum developed by staff. The plan addendum is to be included with plan developed by Trout Mountain Forestry; combined these documents are to be the final plan packet for public adoption and implementation.

## Plan Updates

The following provides the updates to the final Forest Resource Stewardship Plan (2021-2030), organized by order of public comments (as shown in **Attachment A**) that resulted in changes or addenda to the plan:

1. Pg. 67 Addendum: When feasible, controlled burning will be utilized as a management option. Given current Oregon Dept of Forestry Regulations that result in elevated costs and minimal opportunities due to increasing regulatory difficulty, controlled burning/prescribed burning will likely be a limited option for forest management.
2. P9. 87 Addendum: No public access is allowed outside of public trails. County staff will work to ensure that anyone unaccompanied by county staff holds a special use permit, to reduce potential impacts to endangered species and impacts to the forest.
3. Pg.74 Addendum: In regards to “old forest” (80+ year) conditions- Benton County relies on revenue from the Commercial RMUs to support all management on the properties, from maintenance and infrastructure to restoration. That said, revenue is not the driver of the management. Commercial RMUs make up only approximately 1/3 of the total acreage across the parks. At Beazell, the property with the most Commercial Sensitivity Class acreage, the original intent and agreement of the gift from Mr. Beazell was to manage the conifer RMUs in a way that supports park maintenance and environmental education- not to create late successional conifer forests. For Benton County, the ecological and economic are intrinsically linked management goals. Commercial RMU data distinctly provides a stark difference in how these RMUs are managed for both revenue and to provide ecological function in the process, as opposed to being solely managed for commercial objectives. These differences include (but are not limited to):

- Variable density thinning which promotes shrub layer development in the understory, as well as more complex structure on gap edges through heavy branching and large individual tree release.
- Snag creation through girdling and tree topping within the RMU;
- Creation of downed woody debris piles throughout to emulate old growth log additions to the forest floor, indicative of more complex forest types.

Since Benton County is not managing for specific species within the Commercial RMUs, a mix of conditions (early, middle, and late) provides greater ecological opportunities for a greater number of species than if the property were managed all for conifer production. While older conifer conditions are lacking on the property, the majority of the commercial RMUs (something like 80%) are heading that way. From a management perspective, balancing the age classes into early, middle, and late, on an 80-year rotation, the plan ensures that there will always be a presence of each condition on the properties while still meeting the diverse needs of Benton County. It is clear that taking acreage out of this pool will be undercutting/limiting funding for future park staff- a tradeoff that requires further analysis as detailed below.

With regards to older conifer forests, it would be good to question: why are older (as stated 80 year + old) largely not present on stewardship plan lands? Is it because they existed there and were cut down, or is it because historically they largely did not occur there? The plan does not advocate expanding the commercial acreage, but managing what is there to support future management. It's also important to study a strategy where to promote old conifer forest within historically dry/oaky sites in perpetuity under a changing climate- a climate shift that is already contributing to massive conifer die-off throughout the valley and interior coast range at an increasing rate. Managing the existing conifer stands in the previously discussed method will give the county flexibility in adapting to potentially unforeseen issues in the future while maintaining more diversity on the property than what one would see on the surrounding landscape.

As stated in the previous response, no harvests are prioritized or driven by revenue generation for the given stewardship plan location or Benton County as an organization. All projects proposed in the timeline support overall site and specific RMU management goals. The comment focuses on developing future conditions to increase older "80 year" forest reserves that currently are not existent given the historical conditions of each of the 3 stewardship properties, with specific focus on Bezell Memorial Forest. The complexity in developing and extending age classes of specific RMUs requires additional data driven study, combined with an analysis and implementation plan proposal requiring NAPE Advisory Board review and approval. The final plan addendum will include developing an Advisory Board review of current older forest conditions with analysis on possible extension and creation of new older forest RMUs/subset of RMUs. This priority to begin immediately after plan implementation, specifically focusing on the B33 RMU and similar RMUs within Bezell and other plan areas as directed by Advisory Board.

4. Pg.5 Edit: Changed from “Old Forest Remnants” to “Old Forest Legacies...”
5. Edits throughout: Minor term clarifications regarding bird species and habitat was noted and changed in plan based on comments.
6. Pg. 66 Addendum: Wildfire Protection- A private property owner near Fitton Green Natural Area recently granted the Corvallis Rural Fire Protection District an easement to build a 40,000 gallon water tank on our property, for fire suppression. Coordination with CRFPD will occur to try to establish access to this water supply during an emergency wildfire event.

**Attachment A:**

**Benton County Natural Areas Parks & Events (NAPE)  
Forest Resources Stewardship Plan Update 2021  
Public Outreach Timeline & Public Comments with Responses**

**Background**

The following provides:

1. Summary timeline for public outreach over the last year, including official public comment period, to support updating the Forest Resources Stewardship Plan. All written and verbal comments are noted below (Note: Due to COVID-19 restrictions, no in-person public outreach meetings occurred).
2. Natural Areas, Parks, & Events responses to all written public comments received during the comment period.

Summary timeline for public outreach over the last year

- Completed public meeting with Board of Commissioners and Parks Board with Public Notification in January of 2020, to introduce the 10-year plan update.
- Coordinated public Field Trip in January 2020, attended primarily by Friends of OSU Old Growth and other community members as project kickoff and to share past work and plans for update.
- Public Parks Board meetings throughout 2020 dedicated to updating the methodology and goals of the plan.
- Press release sent from the Board of Commissioners office, email updates, and postings to the public outreach information on our website and Facebook page (820 subscribers) throughout plan development period.

- Public release and notification of RFP in April 2020, citizen review of proposal, followed by awarding of plan update to Trout Mountain Forestry during June 2020. See RFP website here: <https://www.co.benton.or.us/parks/page/forest-resources-stewardship-plan-rfp-2020>
- Parks Advisory Board review of early draft plan, with voting for Public Comment Period to be extended during December Parks Board meeting from 2/9/21 to 2/16/21
- Update to BOC at 1/5/21 Work session, with overview of plan updates and approval of public outreach process and timeline.
- After staff and Advisory Board review of earlier plan drafts, posting of the public draft plan on the public outreach page was completed on 1/13/21 for start of public review. See public outreach plan here: <https://www.co.benton.or.us/parks/page/forest-resource-stewardship-plan-update-public-outreach>
- Presentation to Oak Creek Valley community group via virtual meeting on 1/18/21 and provided an update at the time with the download information to the meeting organizers and attendees.
- Trout Mountain Forestry consultant and County held widely attended virtual public meeting on 1/26/21, and this was recorded and can be viewed directly here: [https://www.youtube.com/watch?v=1dKhvPnUqNA&feature=youtu.be&ab\\_channel=BentonCountyNaturalAreas%26Parks](https://www.youtube.com/watch?v=1dKhvPnUqNA&feature=youtu.be&ab_channel=BentonCountyNaturalAreas%26Parks)
- Direct outreach to Confederated Tribes of Grand Rhonde and Siletz Tribes for review (as required under FSC Sustainable Forest Landowner Certification) on 2/1/21.

**Public Comments Received in writing during Public Comment Period: 1/13/21-2/16/21 (see 1/26/21 Public Meeting Video for additional public comments recorded). Note: \*\*\* indicates new commenter, with NAPE Department responses shown in **Red** below:**

\*\*\*\*

This document has a lot of great, useful information. The spatial studies, RMU designations, fantastic. I know how these reviews go, so use what you want, talk with me if something I stated isn't clear, otherwise, great job!

#### **Page**

1. TMU > RMU Great strategy!
3. Continued prescribed (controlled?) meadow burns. Also, the 'Acknowledgements' would work better in the beginning, or end, of the document. It is out of place here.

**NAPE response: Controlled and Prescribed burning are synonymous terms in practice and existing literature. Acknowledgements comment is not clear as they exist in appropriate location of the plan.**

11. Indigenous people. The level of detail, i.e. camas preparation, seems out of place for this document. Describing their relationship to the land, burning, etc, in a general context seems more appropriate.

NAPE response: Under FSC Sustainable Forestry Group Certification, direct consultation to regional tribes is required and providing substantive cultural information was deemed important.

13. Widespread clearcutting at Fitton Grn. is overstated. The harvest left the ash, alder, oak.... so, 'widespread harvest', or 'widespread fir harvest' is more accurate.

NAPE response: Clearcutting statement is clearly described in regards to Douglas Fir only and will remain.

14. You may want to keep the accomplishments general as stated, 'meadow/savanna restoration'. Could add, meadow restoration on \_\_\_\_ A. to enhance endangered species habitat. The other activity you did I thought was successful was 'conversion of \_\_\_\_ A. of marginal fir habitat to upland meadow.

NAPE response: Additional details need to remain as the connectivity between meadow conservation/restoration and forest stewardship is a high priority.

15. Would add somewhere 'Marketing strategies to encourage premium utilization of FSC designation is encouraged when practical.' Idea comes from a cooperative sale of Trout Mt. managed forests to a mill that only milled FSC wood for a short period of time, resulting in premium pricing for premium timber.

NAPE response: Benton County is acquiring new Group FSC certification during the plan period. Research during the plan period showed that no FSC mills and/or premiums available within region for "FSC lumber" resulting in the description to remain in plan.

17. Ownership Objectives already stated on pg. 1. Feels redundant.

NAPE response: Emphasis is placed and retained on priority objectives.

21. F1 should be SC1.

NAPE response: This comment is incorrect. F1 is the RMU, SC is the "sensitivity class" of the associated RMU.

63. Add trailing blackberry, *R. ursinus*, it is ubiquitous at F.H., H 11. Yes, it's native, but invasive at these levels.

NAPE response: These are not high priority for vegetation management within the plan areas, and are not considered invasive based on State and Federal rankings used by county.

67. Would note hose hookup locations at F.H.(near caretaker residence?) and Bezell (coming off side of Forest Ed. Center?). They guys would know.

NAPE response: Comment is focused on water hose from residents on property to mitigate wildfire risk, however these hoses are not high pressure or applicable for emergency level response for wildfire control.

68. Yes to prescribed fire as a useful restoration strategy.

NAPE response: agreement to comment when feasible given current State Oregon Dept of Forestry Regulations that result in elevated costs and minimal opportunities currently. Additional details on the increasing regulatory difficulty in utilizing controlled burning/prescribed burning is noted in the plan addendum.

88. 2021 - 2040 2030.

NAPE response: Incomplete comment.

89. Excellent work schedule. Very practical tool.

97. Scotch broom treatments should be H 11.

NAPE response: All unit management includes invasive weed treatment including Scotch Broom.

### General Comments

- State somewhere in the Beazell portion of the plan, 'No Access' to N. and E. portion of resource, due to potential impacts to endangered species. Important to codify for future leadership, as much as the public.

NAPE response: Clarification on public access was included in final plan addendum.

- You may be doing this already, but restoration activity tracking (as in dates)/meadow/site would be good to document. Include a place for review/conclusions. Did it work? What would you do differently next time?

NAPE response: Restoration projects completed within Prairie Conservation Areas (PCAs) are tracked through the Habitat Conservation Plan (HCP) program and reported annually to USFWS and pertinent local organizations.

- Text at the bottom of each page needs to be justified.

NAPE response: Comment not applicable for final version.

- Imagine a final of this plan will be available on the web. If not, I would appreciate an electronic copy.

NAPE response: Final plan including plan addendum will be provided on the project website as PDF for download.

\*\*\*

1) Who is responsible for putting the roads back in shape after harvests? Story has it that the previous gravel was paid for by the Audubon Society, as the county does not have money to fix this road. The group is concerned as the road to Wren is also our emergency escape route.

NAPE response: The department determined that this work is a high priority due to the increased die off of douglas fir in the south units of Fitton Green, combined with oak mortality

threats, wildfire risk reduction, and the ability to better access and control False Brome (noxious weed). When the project does proceed, the emergency evacuation route to Cardwell Hill Road- to the western gate will be utilized. As for the details on the funding for the road rockings completed last year, a county/private/non-profit partnership made this occur. Please note that the county would ensure that any hauling impacts to road would be minimized and remediated as needed, and that the ability for residents to use the emergency access route at all times would occur- similar to other projects completed within Fitton Green in the past.

2) Members of the group thought they saw a big increase in the presence of False Broome after the previous harvest. They were wondering whether there will be special consideration this time, like cleaning logging equipment. Fitton Green is a Natural Area after all.

NAPE response: The entire area of Cardwell Hill foothills including Panorama neighborhoods, and Fitton Green (outside of highly managed Prairie Conservation Areas), have had the highest density of False Brome noxious weed presence in the entire Benton County region for over a decade. This is due to many factors stemming from original introduction, spread by animals (domestic and native), and many human impacts. Please note that Benton County is focused on managing this issue through our existing public funding including: routine targeted spraying within newly identified patches, pre and post project spraying, and requirements that all equipment be cleaned before entering county properties. The facts are that the False Brome density is at such a high degree that elimination is not possible, so the county completes the above activities to ensure risk reduction and control.

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#### General Comments:

1. I found the strategy for habitats of limited or no commercial value quite strong: meadows, oak savannah, and oak woodlands. My primary concern is regarding the language and strategy regarding management of Douglas-fir stands (RMUs). I am sure the intent was to be transparent but throughout the document I found the ecological rationale for harvest to be particularly unsupportable in all but treatments for oak habitats. There needs to be a clear statement up front that harvests of most Douglas-fir stands are a revenue source for restoration work, facilities, or otherwise. Rather, harvests are often discussed as contributing to ecological goals. For example, a goal of balanced age classes (see P. 77 and elsewhere) is simply not supported ecologically when the balance almost entirely excludes old forest and there are abundant young forests in the broader landscape (see p. 3 and elsewhere). My related concern is that we are missing very important opportunities to develop old forests (>80 years old). The acreage given to this goal are extremely minor. Allowing for legacy older trees in otherwise harvested stands is beneficial, but not sufficient to meet this landscape need of old forests. Currently, and even more so in the future, old forest conditions will only be met on public lands—the lands surrounding each of the park/natural areas surely are composed largely of young forests of various age classes and that will continue into the future. Developing greater acreage and distribution of old (conifer) forests will reduce revenue- the trade-off between ecological value and revenue is real, and one that you know best because of restoration and operation costs that have to be supported



through harvest. What I think you will hear from conservation groups/individuals is that the draft Plan promotes the strategy of Douglas-fir harvests in ecological terms whereas the goal is clearly revenue based (and thus old forests largely excluded). I hope you will revise the harvest strategy to provide greater acreage and distribution of old forests. A few of the many examples from the draft plan that I believe provides support for my perspective that the language in the draft Plan promotes harvest for ecological (rather than revenue) reasons are 1) p. 5, paragraph 4: “Harvest levels are based on forest health and ecological goals, and are not revenue driven”, 2) P. 18, Timber Mgmt. “with sufficient harvesting and regeneration to provide early successional habitat and balance the ages of the stands”, and 3)p. 53, Old Forest Reserves—here, despite the terminology of “reserves” we see that old forest stands are absent, or extremely rare if B33 is considered “old”. Early successional forests are likely not limiting on a larger landscape scale than the park/natural area (a scale that is relevant for this issue), nor is there an ecologically valid argument to “balance the age of stands”. Indeed, on Page 75, authors note that there are few old forests nearby the Benton Co. properties—again, why these properties should contribute to development of old forest in the landscape.

**NAPE response:** Benton County relies on revenue from the Commercial RMUs to support all management on the properties, from maintenance and infrastructure to restoration. That said, revenue is not the driver of the management. Commercial RMUs make up only approximately 1/3 of the total acreage across the parks. At Beazell, the property with the most Commercial Sensitivity Class acreage, the original intent and agreement of the gift from Mr. Beazell was to manage the conifer RMUs in a way that supports park maintenance and environmental education- not to create late successional conifer forests. For Benton County, the ecological and economic are intrinsically linked management goals. Commercial RMU data distinctly provides a stark difference in how these RMUs are managed for both revenue and to provide ecological function in the process, as opposed to being solely managed for commercial objectives. These differences include (but are not limited to):

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acreage out of this pool will be undercutting/limiting funding for future park staff- a tradeoff that requires further analysis as detailed below.

With regards to older conifer forests, it would be good to question: why are older (as stated 80 year + old) largely not present on stewardship plan lands? Is it because they existed there and were cut down, or is it because historically they largely did not occur there? The plan does not advocate expanding the commercial acreage, but managing what is there to support future management. It's also important to study a strategy where to promote old conifer forest within historically dry/oaky sites in perpetuity under a changing climate- a climate shift that is already contributing to massive conifer die-off throughout the valley and interior coast range at an increasing rate. Managing the existing conifer stands in the previously discussed method will give the county flexibility in adapting to potentially unforeseen issues in the future while maintaining more diversity on the property than what one would see on the surrounding landscape.

As stated in the previous response, no harvests are prioritized or driven by revenue generation for the given stewardship plan location or Benton County as an organization. All projects proposed in the timeline support overall site and specific RMU management goals. The comment focuses on developing future conditions to increase older "80 year" forest reserves that currently are not existent given the historical conditions of each of the 3 stewardship properties, with specific focus on Beazell Memorial Forest. The complexity in developing and extending age classes of specific RMUs requires additional data driven study, combined with an analysis and implementation plan proposal requiring NAPE Advisory Board review and approval. The final plan addendum will include developing an Advisory Board review of current older forest conditions with analysis on possible extension and creation of new older forest RMUs/subset of RMUs. This priority to begin immediately after plan implementation, specifically focusing on the B33 RMU and similar RMUs within Beazell and other plan areas as directed by Advisory Board.

Specific Comments (page numbers refer to the page number listed on each page and not the PDF page no.):

2. Forest health- this should be defined at first use and included in the glossary. For many of us working on wildlife conservation issues, "Forest Health" is often a loaded term that relates to the ability to provide high quality timber. So clarification on what is really meant here is needed—or perhaps remove the this term if not easily defined by Trout Mountain.

NAPE response: on pg 2 Forest Health is referring to concerns threatening all trees (not just timber species) on the property. Examples provided include oak that is being overtopped and shaded out by fir, drought stress of conifer species, and invasive species proliferation (the implication being that invasives can outcompete native tree species establishment).

3. Trends analysis, exec summary, p. 2: Some clarification to "meadow wildlife is increasing" is needed, it is not sufficiently detailed to have relevance— are the authors

referring to endangered butterflies? And what data are being used here? Other than counts from butterfly surveys, I am not aware of other efforts at these sites.

NAPE response: This work is discussed in greatest detail in Appendix B, which highlights the work that the County and IAE have done to date in the meadows. It is not specifically highlighted more in the plan because the focus of the FRSPU is the forestland. That said, the importance of the meadows to the overall properties, and how they are interconnected with the forestland deserved to be highlighted instead of compartmentalized.

4. P. 5, paragraph 3: “well managed conifer stands” – what is meant here? Often this is a loaded term related to management to increase commercial value at harvest. Also, are “old forest remnants” really forest stands or simply lone trees? Clarification here is important so readers are not unintentionally misled. I believe the meaning here is intended to be legacy trees, not “remnants” which I would interpret as small patches of old forest.

NAPE response: Pg 1 identifies the properties as following FSC principles, which do not solely focus on increasing the commercial value of the forest. This level of certification which is adopted globally as the highest/most stringent, clearly implies what “well-managed” entails. Remnants implies individuals or small groups scattered throughout younger stands, but nothing that is to be considered stand. The final plan was Edited to say “Old forest legacies...”

5. Paragraph 4: “songbirds” are not a species 😊 I think what was meant here is “...a large number of bird species..”

NAPE response: Edited to state “a large number of bird species”

6. P. 17, Recreation: a) Suggest replacing “Recreation use **avoids** impacting sensitive areas..” to “**minimizes** impacting...” b) That impacts to neighbors is minimized is simply not accurate at a place like Fitton Green- indeed, the very high traffic to Fitton Green has seriously impacted neighbors. Let’s be transparent, state that up front, and note that this issue needs to be addressed.

NAPE response: Changed to “minimizes”

6. Inconsistent use of “native” and “indigenous” when discussing plants/animals.. “Native” seems to be the most common use in this Plan and elsewhere.

NAPE response: Found one instance on pg 18 of indigenous being used this way and changed to native

7. P. 18, Wildlife. You can’t “ensure” that populations of endangered species (or any for that matter) are maintained. Perhaps change to “..promotes endangered species..”

NAPE response: Changed to “Wildlife and fish habitat improvements promote species diversity and endangered species.”

9. P. 19, Sensitivity Class 2 “**Typical** of old forest stands” – again, I think this is unintentionally misleading given the rarity (or absence) of old forest.

NAPE response: Old Forest does not simply refer to conifer forests. There are some very old oak stands on the properties.

10. P. 29: Fish and Wildlife Habitat— a) add “known” to “.. one of only two [KNOWN] locations in Oregon with Taylor’s checkerspot butterfly. b) there are no turtles or frogs that are state or federally listed as threatened/ endangered. Remove “listed” and all is accurate. Or remove listed and add “sensitive species” .

NAPE response: Added “known”. Removed “listed”

11. P. 30, Desired Future Conditions: I would very much like to see old conifer stands (RMUs) added here, and not simply individual trees. Retaining and recruiting large old individual (legacy) trees in harvest units has lots of ecological value but it does not at all have the same value as old forest stands.

NAPE response: Please see discussion above and plan addendum regarding this request.

12. P. 37, Recreation. There has been an enormous increase in recreation traffic at Fitton Green, with traffic resulting in large impacts to neighbors. This is a major issue to neighbors and that is not conveyed in this paragraph- noting an increase in use over 10 years is not sufficient.

NAPE response: This is how park usage was tracked through car counts and surveys the last 3 years from start of work until plan development.

13. P. 53, Old Forest Reserves: Only here do we see that old forest is absent other than as legacy trees. There is such an obvious need for more of the acreage to be devoted to old forest, not just scattered legacy trees. And transparency is needed for the readers.

NAPE response: If Benton County Advisory Board process as outlined above results in a recommendation to remove more of the acreage from their Commercial areas, then that recommendation will be presented to Board of Commissioners for approval. This was not a plan priority during numerous conversations with staff and county advisory board members at the time the plan outline was drafted.

14. P. 61, change “butterfly **varieties**” to “butterfly **species**”

NAPE response: changed.

15. P. 66, Wildlife Protection: Explicit comments on how forest management could be used to reduce fire risk would be very helpful here. For example, recommending that conifer plantations should be avoided in sensitive fire-risk areas. I am not up on fire risk, but the plantation suggestion just takes text in the draft Plan to a logical (??) recommendation concerning fire.

NAPE response: Added “Overall, reducing fuel loading through forest management activities can help reduce wildfire risk” pg 67. Reality is that no amount of forest management could prevent against something like the Labor Day fires, whether things like plantations were in fire risk areas or not. For other non-historic fire events, plan

outlines access, prescribed fire, and management as risk mitigation strategies, as well as shutting down parks on red flag warning days.

16. P. 70, There is no state-level Endangered Species Act but statutes exist under which the state can list threatened and endangered species.

**NAPE response: Changed to “activities on its lands into compliance with the Federal Endangered Species Act, as well as State statutes.”**

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RE: Public Comments, Benton County Forest Resource Stewardship Plan Thank you for the opportunity to provide comments on the Forest Resource Stewardship Plan. We were very impressed with the breadth and intent of the Plan to guide the county’s management of Fitton Green Natural Area, Fort Hoskins Historic Park, and Beazell Memorial Forest. The Plan was very well written and organized, facilitating the ability to provide what we hope are helpful comments as you make final revisions to the plan. For full transparency, we note that two of us have been involved in the Forest Resource Stewardship Plan; Dan Rosenberg is a member of the Benton County Parks and Natural Areas advisory board, and Jennifer Gervais was invited to participate in the review of the proposals the County received to prepare the Plan. Dan Rosenberg previously sent comments on the Plan to Parks and Natural Areas staff and fellow advisory board members. Staff included these comments as part of the record of public comments received for the Plan. Here we highlight the key issue in those comments and provide recommendations. Development of Old Conifer Forest is Needed Our concerns specifically address the management of the Douglas-fir forests which are the dominant habitat type at Beazell Memorial Forest. While we recognize that the proposed management of the large acreage of Douglas-fir at Beazell (units designated Sensitivity Class 4) can provide a sustainable forestry operation that meets FSC standards, we do not believe that the proposed approach maximizes the ecological values that the Plan purports, including carbon sequestration. Logging of the forest units are often discussed in the Plan as contributing to ecological goals—and surely some level of thinning provides ecological benefits and the strategy is more ecologically based than a commercial forestry operation.

We strongly believe the County is missing very important opportunities to develop old forests (>80 years old). For example, a goal of balanced age classes (see P. 77 and elsewhere) is simply not supported ecologically when the balance almost entirely excludes old forest and there are abundant young forests in the broader landscape (see p. 3 and elsewhere). Indeed, the overall harvest strategy for the Beazell forests is a rotation age of 80 years old—meaning that old conifer forest (typically defined as >80 years old in the Pacific Northwest) will not develop other than in one or maybe two small parcels, as identified in the Plan. The Plan spells this out very clearly (p. 80): “... increase emphasis on regeneration harvests as stands mature with 80 years being the target rotation age for SC4 RMUs [research management units].” Allowing for legacy older trees in otherwise harvested stands is beneficial (p. 78: “Consideration will also be given to retaining legacy and “defective” trees to maintain and enhance structural variability”), but not sufficient to meet the landscape need of old forests. Currently, and even more so in the

future, old forest conditions will only be met on public lands—the lands surrounding each of the park/natural areas are composed largely of young forests of various age classes and that will continue into the future. It is well known that many wildlife species are strongly associated with old conifer forest in the Pacific Northwest—and these species are often lost in landscapes dominated by young forest. Similarly, numerous studies have demonstrated that the value of Douglas-fir forests as carbon sinks, another stated goal of the Plan, substantially increases as they mature. Developing greater acreage and distribution of old (conifer) forests will reduce revenue- the trade-off between ecological value and revenue is real, and one that Benton County staff know best because of restoration and operation costs that have to be supported through harvest. Despite the good intentions, the draft Plan promotes the strategy of Douglas-fir harvests in ecological terms whereas the result is clearly revenue based (and thus old forests largely excluded). We urge you to modify the Plan to provide greater acreage and distribution of old forests. Indeed, the Plan notes that there are few old forests nearby the Benton Co. properties (p. 75)—again, why Beazell Memorial Forest should contribute to development of old forest in the landscape. Recommendations We recognize that Benton County’s staff time and financial resources to modify the Forest Resource Stewardship Plan are limited, although funds held for management of Beazell from earlier harvests should be considered for amending the Plan. We further understand that the costs for operations and management of Beazell must come from harvest of the valuable timber. These two needs suggest modifying the Plan such that the acreage that provides harvest sufficient to sustainably provide revenue for operations and management be determined and the remainder be designated for old forest development. Selection of which units should be harvested or developed into old forest will be an important future task. Silvicultural treatments, such as thinning, will be needed to facilitate developing former plantations into more natural forest conditions. Fortunately, there is much experience to draw upon in guiding development of managed forests to old forests because of the Northwest Forest Plan’s management of vast acreage of federal (now US Forest Service) lands towards old forest. It is critically important to not lose opportunities for old forest development. We urge that the County revise the draft Plan by incorporating a clear strategy for old forest development before any harvests take place. Silvicultural treatments that are consistent with development of old forest, such as thinning operations, should be able to proceed prior to revision of harvest schedules to allow for old forest development, should that be necessary in the next few months due to timing issues and partnerships. Thank you once again for allowing us the opportunity to provide comments on the Plan. We hope these comments prove useful to you as you revise the draft Plan. Again, overall it was an excellent comprehensive plan with a lot of great thinking of what was needed. Our primary recommendation is a strategy to increase old forest acreage and distribution through time and a more transparent approach in discussing the tradeoffs of revenue and ecological values.

**NAPE response:** Benton County relies on revenue from the Commercial RMUs to support all management on the properties, from maintenance and infrastructure to restoration. That said, revenue is not the driver of the management. Commercial RMUs make up only approximately 1/3 of the total acreage across the parks. At Beazell, the property with the most Commercial acreage, the original intent and agreement of the gift from Mr. Beazell was to manage the conifer RMUs in a way that supports park maintenance and environmental education, not to create late successional conifer

forests. For Benton County, the ecological and economic are intrinsically linked. Commercial RMU data distinctly provides a stark difference in how these RMUs are managed for both revenue and to provide ecological function in the process, as opposed to being solely managed for commercial objectives. These differences include (but are not limited to):

- Variable density thinning which promotes shrub layer development in the understory, as well as more complex structure on gap edges through heavy branching and large individual tree release.
- Snag creation through girdling and tree topping within the RMU;
- Creation of downed woody debris piles throughout to emulate old growth log additions to the forest floor, indicative of more complex forest types.

Since Benton County is not managing for specific species within the Commercial RMUs, a mix of conditions (early, middle, and late) provides greater ecological opportunities for a greater number of species than if say the property were managed all for conifer production. While older conifer conditions are lacking on the property, the majority of the commercial RMUs (something like 80%) are heading that way. From a management perspective, balancing the age classes into early, middle, and late, on an 80-year rotation, the plan ensures that there will always be a presence of each condition on the properties while still meeting the economic needs of Benton County. Taking acreage out of this pool will be undercutting/limiting this source of funding for future park staff- a tradeoff that requires further analysis as detailed below.

With regards to older conifer forests, it would be good to question why they are largely not present on BC lands. Is it because they existed there and were cut down, or is it because historically they largely did not occur there? The plan does not advocate expanding the commercial acreage, but managing what is there to support future management. It's also important to note that promoting old conifer forest on historically dry/oaky sites in perpetuity under a changing climate that is already killing conifer throughout the valley and interior coast range at an increasing rate, is a sound strategy. Managing the existing conifer stands in the previously discussed method will give the county flexibility in adapting to potentially unforeseen issues in the future while maintaining more diversity on the property than what one would see on the surrounding landscape.

As stated in the previous response, no harvests are prioritized or driven by revenue generation for the given stewardship plan location or Benton County as an organization. All projects proposed in the timeline support overall site and specific RMU management goals. The comment focuses on developing future conditions to increase older "80 year" forest reserves that currently are not existent given the historical conditions with specific focus on Beazell Memorial Forest. The complexity in developing and extending age classes of specific RMUs requires additional data driven study, combined with an analysis and implementation plan proposal requiring NAPE Advisory Board review and approval. The final plan addendum will include developing an Advisory Board review of current older forest conditions with analysis on possible extension and creation of new older forest RMUs/subset of RMUs. This priority to begin immediately after plan

implementation, specifically focusing on the B33 RMU and similar RMUs within Bezell and other plan areas as directed by Advisory Board.

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Hello Adam,

I am writing to again to request an extension to the comment period for the Benton County Forest Resources Stewardship Plan Update. My request is to allow more individuals in our community, including myself, to review the document and provide comment. My request is for the comment period to extend to March 1, 2021.

NAPE response: The comment period was extended from 1/13/21-2/9/21, to 2/16/21 and the commenter was notified of these opportunities 3 weeks and 1 week in advance of deadline. The Director for NAPE informed the commenter and also stated that the comment period would be closing as approved by the NAPE Advisory Board.

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Please find my feedback for the Forest Resources Stewardship Plan, many were part of the discussion while you part of the OCVSAG meeting.

1) Add bike racks at entrances to sites covered by the plan to increase opportunity for bike to site, then hike

NAPE response: This comment is not a component of the Forest Resources Stewardship Plan, which solely addresses forest resources management.

( Objective #2)

2) Add a permit process for large groups, events, and commercial events: For example, religious/spiritual services, weddings, photography, and other events take place on the upland prairie hilltop of fitton green with folks off trail which is not allowed per Adam. The permit process could be an opportunity to educate, entice people to stay on the trail, encourage carpooling or use of shuttle services.

NAPE response: A Special Use Permit is required for all activities as described in comment, however if NAPE is not made aware of these activities a permit action will not occur.

(Objective #6)

3) Signage - new (large) Fitton Green signs on Panorama have been made to read Fitton Green "County Park". As Adam explained Fitton Green is not a park. Request a change to signs, they



could cover County Park with the words Natural Area, or make a new sign. As a park is defined differently, this helps preserve the intent of expectations and use of a natural area. Do not change the sign on Panorama/Fir Ridge.

**NAPE response:** This comment is not a component of the Forest Resources Stewardship Plan, which solely addresses forest resources management.

(Objectives #3, and #5)

4) Signage - show that bike use is not allowed from 10/15-4/15 as per Adam Stebbins, be clear what trails are OK for mountain bikes

**NAPE response:** This comment is not a component of the Forest Resources Stewardship Plan, which solely addresses forest resources management , however this signage already exists on site.

(Objective #6)

5) Signage - "Keep on Trail" at entrance gates, and explanation at the entrance Kiosks for prevention of damage to upland prairie and riparian zone in Fitton Green

**NAPE response:** This comment is not a component of the Forest Resources Stewardship Plan, which solely addresses forest resources management , however this signage already exists on site and trail areas where prairie/forest unsanctioned trail hiking is occurring.

(Objectives #3, #5 and #6)

6) Work with site access hosting neighbors and neighborhoods to have recorded the impacts to neighbors and align on paths to reverse negative trends especially due to the increasing volume of vehicular traffic and the issues it catalyzes in topics diverse as roadway safety, fire prevention and environmental damage.

**NAPE response:** This comment includes components that are not all part of the Forest Resources Stewardship Plan, however ongoing meetings with the aforementioned groups has been initiated and coordinated by NAPE Director.

(Objective #6, #8 and management policy overview point 1)

7) Do not log existing trees Doug Fir, or Grand Fir trees >24" in diameter or >140' tall as they represent a view of what older growth used to be. (27" shared by Klaus as upper end efficient for production timber harvest)

(objective #2, #3 and #9)

**NAPE response:** This is not a priority except under salvage or major damage situations.

8) Manage parking areas to planned size e.g. 9 spots at Fitton Green and add Bollards or other barriers to prevent making mud holes within the parking area. Replant native species.

(Objective #2, #4 and #6)

NAPE response: This comment is not a component of the Forest Resources Stewardship Plan, however community to county discussions on these matters is occurring through a different process.

9) Establish a process and volunteer effort to eliminate invasive species e.g., false brome/ Himalyan blackberries/ Hawthorn

(Objective #1, #3, #4, and #6)

NAPE response: There are currently volunteer opportunities such as the ones referenced above, and the volunteer process is provided on the NAPE website at:

<https://www.co.benton.or.us/parks/page/volunteer>

10) Establish a process for volunteers to be able to be "permitted", figuratively and maybe literally to "work" on trail restoration, native species planting and invasive species elimination

(Objective #2, and #4)

NAPE response: There are currently volunteer opportunities such as the ones referenced above, and the volunteer process is provided on the NAPE website at:

<https://www.co.benton.or.us/parks/page/volunteer>

11) Establish a process on logging equipment to minimize transfer of invasive species as much as possible.

NAPE response: Cleaning of all heavy equipment prior to entering any natural area is required for any project.

(Objective #3, and #5)

I would better like to understand the comment about Fitton Green having a "cross-jurisdiction recreational development" - what does that mean, or who is it envisioned to involve.

NAPE response: The cross jurisdictional recreational development references the interconnections of the Fitton Green, Greenbelt Land Trust, and Crestmont Land Trust properties.

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Adam:

I just finished reading the plan. Nicely done. It has the right combination of overall management direction and site specificity. I've also sent it on to our Culture program folks for review.

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Good day,

My name is Heidi Hagler. My husband Chris and I are new to the area, having moved to our house on Chaparral in October, 2019. Many thanks to you and the County for commissioning the Forest Resources Stewardship Plan, and for making it available to the public for feedback. Your care in managing a number of constituents' concerns related to this important topic is appreciated.

This email provides comments related to the Forest Resources Stewardship Plan, as they relate to Fitton Green Natural Area (FGNA) based on our observations as frequent walkers on the trail and residents living on the car route to the Panorama trailhead, in the context of certain aspects of the Stewardship Plan (e.g. the Ownership Objectives).

### **Wildfire**

One aspect of wildfire prevention is visitor management. We have noted in FGNA the following: expended cigarette butts, remnants of fireworks, evidence of campfires, camping with use of camp stoves (pre-COVID) and parking on very dry grass outside of the nine designated slots. Decisions about forestry management are of course very important in wildfire prevention but as noted in the report most wildfires are human-caused. Recognizing that many in the County do not currently have secure housing, I believe we still need to enforce the prohibition on camping at FGNA due to a number of factors but especially fire risk (which could lead to the loss of many additional homes).

**NAPE response:** This comment is not a component of the Forest Resources Stewardship Plan, however community to county discussions on these matters is occurring through a different process.

Parking has become very congested at the Panorama trailhead, especially on days which are sunny (e.g. during the summer when fire risk is high). There are nine parking slots at the trailhead but neighbors have counted about 30 cars parked on both sides of the road. The Stewardship Report notes that firefighters can access FGNA via the local roads, but it is worth noting first responder access could well be limited unless roadside parking is prohibited (which would also be wise for fire prevention as noted above).

**NAPE response:** This comment is not a component of the Forest Resources Stewardship Plan, however community to county discussions on these matters is occurring through a different process.

Last, we recently granted the Corvallis Rural Fire Protection District an easement to build a 40,000 gallon water tank on our property, for fire suppression. The Stewardship Report notes the only water available for fire suppression at FGNA is a stream near the Cardwell Hill side of FGNA. I'm not clear on when the water can be used by agencies other than City of Corvallis, but it's worth noting and further discussion with CRFPD may be helpful to you.

NAPE response: Noted in the plan addendum.

## Recreation and Visual Resource Management

This section of the report (and elsewhere) notes that Areas like FGNA “...focus on hiking and nature appreciation” which “...avoids impacting sensitive areas, wildlife and fish habitats...or other resources.” It goes on to say, “Impacts to neighbors are minimized.”

It’s really important that FGNA is a *Natural Area*, not a Park. Calling Fitton Green a Natural Area sets the stage for a certain type of use and respect for the environment. Park users have different expectations, and park infrastructure (e.g. play equipment, sports field, picnic tables) help to encourage park-appropriate activities. I’ve noticed on some signage where Fitton Green has been referred to as a “Park.” It’s tempting to think this is a small matter but it isn’t. If people are told they are in a park they will treat the space as if it were a park. For example, other than one sign warning of habitat restoration, I’ve not seen signs requiring visitors to stay on-trail. I have, however, watched a dad encourage his kids to “go explore” off the trail (which they did), and many times have seen off-leash dogs bounding around off-trail. As noted above, we’ve seen camping off trail and debris from camping and other activities off-trail. This use is inconsistent with the Stewardship Plan but I didn’t see where the Plan addresses this problem.

NAPE response: Kiosk postings at all three county entrances clearly state what is allowed within the Fitton Green Natural Area. All of the uses noted above are not allowed and signage for dog leashes and staying on trail are required, however no enforcement occurs unless staff is present for projects.

I’ve also been on the trails in FGNA a number of times and seen off-trail use by groups of people having portraits taken by professional photographers. They have chosen a beautiful space to commemorate the wedding, engagement, baby-on-the-way or extended family picture. The problem of course is that the space is not intended for commercial use. In addition, most of the photographs I’ve seen have been off-trail (Google Fitton Green Family Photography for examples). Since the pandemic, people arrive for the photographs in separate cars, adding to the parking congestion, and the people being photographed must be avoided if the pictures are on-trail because the subjects’ masks are off. I’ve also seen church group gatherings, pictures of a wedding in FGNA and guided hikes in the area.

NAPE response: A Special Use Permit is required for all activities as described in comment, however if NAPE is not made aware of these activities a permit action will not occur.

The report also notes that Geocaching is also allowed in FGNA; is it the County’s opinion that this off-trail activity is an acceptable risk to the habitat?

NAPE response: A Special Use Permit is required for all activities as described in comment, however if NAPE is not made aware of these activities a permit action will not occur.

In conclusion, my concerns rest where visitor management intersects with the Stewardship Plan. Can the Stewardship Plan be enhanced include active visitor management in order to reduce the wildfire risk, negative impacts on habitat and adverse impacts on neighbors?

**NAPE response:** This comment is not a component of the Forest Resources Stewardship Plan, however community to county discussions on these matters is occurring through a different process.

Again, thank you for your collaboration on these issues that impact the beautiful spaces that are so important and special to us all.

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Hi Adam,

Thank you for this opportunity to provide feedback. I work mostly on transportation issues, so while much of the plan is out of my depth, I'd like to mention a couple of areas where transportation may facilitate some of the Management Objectives and Policies.

In seeking to support objectives 1, 2, 3, 5, 6, 8, and 9, I think about the mode people use to access and experience the areas. The plurality of an Oregonian's greenhouse gas emissions comes from transportation, emissions that impact all of the mentioned objectives. There are ways these areas can support lower emission vulnerable road users. Fitton Green exists as both a destination and a thruway between the Willamette Valley and Kings Valley/Harris for otherwise vulnerable road users (pedestrians, cyclists, etc.). Putting bicycle racks prominently at the Fitton Green trailheads demonstrates support for non-vehicular modes of access to those whose destination is Fitton Green. Providing year-round throughways for all vulnerable road users supports wider adoption of lower-impact lower-emission modes of transportation. Marking critical thruways as recreational casts a light of frivolousness about non-vehicular modes of transportation and puts those users' lives at risk when their alternative is the shoulder of Hwy 20. I can appreciate these issues may fall outside of what is typically considered part of a forest stewardship plan. Still, I hope these suggestions can be seen as trying to support the forests' existence for generations to come.

**NAPE response:** This comment is not a component of the Forest Resources Stewardship Plan, however community to county discussions on these matters is occurring through a different process.