

**Comments on Greatest Permanent Value
to the Board of Forestry
from a Diverse Coalition of Organizations
Committed to the Management of
the Tillamook and Clatsop State Forests
November 3, 2006**

As you will recall, numerous conservation organizations, representing thousands of Oregonians with a wide range of interests and opinions, came together in April of this year to present the Board of Forestry with a single voice. We wanted to reaffirm our view that the Board's legal mandate to manage state lands is for a greatest permanent value in the interest of all Oregonians. We chose to speak with one voice for two reasons—we understood the pressure the Board faced, and we wanted to provide input in a constructive and efficient fashion. Through conversations with one another, we were able to find among our diverse priorities a common ground in line with the spirit of the Greatest Permanent Value Rule.

Our central concerns were these: 1) While we had relative confidence in the timber output predictions from ODF's Harvest and Habitat (H&H) model, there were good reasons for less confidence in the habitat portion of the model; 2) To properly apply the standard of greatest permanent value, we suggested that one must adopt a broad view of economic value. Economic value is not synonymous with timber value. Rather, a broad range of values flow from our state forests—including timber, water, wildlife, and recreation values. One example is seen in a recent edition of the Sunday Oregonian (October 8, 2006), which described the growing interest and success of nature tourism industries in the Tillamook area.

As we noted in our April comments, the H&H model presented:

a limited view of economic value. For each H&H model run, a section titled "economics" is included. This section would more accurately be titled "harvest revenue," for as the H&H final report notes, "economic benefits derived from other forest values (fish, wildlife, water, air, scenic, complex habitat, etc.) are not evaluated in this report" (p.52).

Despite the shortcomings of the H&H model, we expressed our excitement that ODF had subsequently awarded a contract to study the broad economic values provided by the state lands, rather than simply timber values. Better information on the full range of values that could be provided by different management regimes will increase our confidence in management choices.

However, the Department cancelled the request for proposals to conduct the independent study on wider economic values. Then the State Forester issued a memo on June 5 that directed staff to explore the economic, environmental, and social tradeoffs if complex structure were reduced from 50% to 40%, and if timber harvest departed from non-declining flow, resulting in a short-term emphasis on timber production.

The June 5th memo shows no recognition of the stark habitat findings of the H&H report. As you know, the H&H model predicts that it will take more than 100 years to produce patches of older forest structure (OFS) on one quarter of the acreage of the North Coast state forests. Although 25% of the forest as older forest structure will be a large improvement over the current 3%, 100 years is a very long time to wait.

We understand that there is a second phase of review of the Implementation Plans that will start soon, and we hope that our concerns will be addressed in that planning effort. As such, we have come together again today to offer the following recommendations in a single voice:

First, ODF should focus attention on methods to protect and attain complex forest structures in the next 10-20 years. We request that you commission a team of biologists -- both internal and external to the agency -- to consider the best strategies for creating complex habitat in the near term. Such a team would review the landscape design to consider whether modifications to the management pattern may speed the availability of complex structures. The team could also consider whether modifications in harvest guidelines -- such as heightened green tree retention, diameter limits, or creation of snags and downed wood -- could assist in more rapidly achieving late-successional forest development goals.

Second, ODF should conduct the study of non-timber values that flow from the state forests as described in the cancelled RFP. Such a study would be consistent with the Board's long commitment to the conservation of biodiversity and participation in the Montreal Process, and would be in line with the landmark recommendations of the Millennium Ecosystem Assessment.

Third, the Department should instruct forest management districts to consider more ambitious recreation goals as part of the consideration of any changes to the Implementation Plans. The recreation program in the Astoria District is particularly underdeveloped.

Lastly we would like to reiterate one other point from our April 15 comments: ODF should stop incorrectly using the word "economic" as a synonym for "timber harvests." For example, Forester Brown's June 5 memo says that according to the H&H, "economic outputs...are substantially lower than what was anticipated." In fact, there exists no comprehensive study of Northwest Area state lands' economic outputs -- there is only a model of the economic value of the timber. Timber harvests are but one form of economic value. To mistake the timber part for the economic whole is inconsistent with any reasonable interpretation of greatest permanent value.

We sincerely and respectfully offer our appreciation for your public service, and we look forward to continuing to work with the board on the management of these lands that we all cherish.

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Audubon Society of Portland, Susan Ash
Wild Salmon Center, Guido Rahr
Center for Biological Diversity, Noah Greenwald
Trout Unlimited, Oregon Council, Tom Wolf
Sierra Club, Oregon Chapter, Donald Fontenot
Umpqua Watersheds, Francis Eatherington
Coast Range Association, Chuck Wiler
Native Fish Society, Les Helgeson
Crag Law Center, Chris Winter
Oregon Trout, Brett Brownscombe