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**Comments of Donald Fontenot, State Lands Issue Coordinator,
Oregon Chapter Sierra Club**

**Oregon Board of Forestry:
5 March 2008**

Good Morning.

My name is Donald Fontenot; I am the State Lands Issue Coordinator for the Oregon Chapter of the Sierra Club. We have been actively involved in the Tillamook and Clatsop State Forests for well over 10 years and our members are greatly concerned about the future of these publicly owned lands.

I have been closely monitoring the on-the-ground effects of ODF's implementation of the Forest Management Plan since it was adopted in January 2001. I am here today to convey on behalf of the Club (and its 24,000 Oregon members) the very serious concerns we have regarding the 2009 Annual Operation Plans (AOPs) recently released for public comment, particularly timber sales in Tillamook District.

We are deeply concerned that some of the current operations fail to achieve the greatest permanent value as defined in Oregon statutes and administrative rules. In particular, we feel that many of the planned timber harvests fail to meet requirements for protection of "aquatic habitats for salmonids, and other native fish and aquatic life; ...native wildlife habitats;...soil, air, and water;...and outdoor recreation opportunities" as mandated in ORS 530 and OAR 629-035. We also firmly believe that these plans are not based on the required "best available science."

Let me begin with a few facts from the Tillamook 2009 AOP:

- 1) 69% of the harvest will be by clear-cutting; that's about 3000 acres.
- 2) 8 of the 15 primary timber sales have clearcuts greater than 100 acres.
- 3) 9 of the 15 are planned to clearcut forest designated to become complex.
- 4) Plans call for thinning in a Marbled Murrelet Management Area, despite the decreasing number of marbled murrelets on ODF lands, and despite the fact that the area biologist notes this sale poses a moderate risk to this imperiled species.

Particularly alarming are operations like the Peak Out timber sale in the Kilchis basin, which plans to clearcut 119 acres of "Understory" that is designated to become layered. How does clearcutting these mixed conifer-hardwood improve forest structure? Or consider the Fitch Creek timber sale, also in the Kilchis basin, which will clearcut 534 acres in 7 different units. According to page 6 of the Fitch Creek Draft Pre-Operations Report: "The risk of landslides delivering directly from the sale to all streams is high." Why are we clearcutting this basin. The ODF states that it "is made up of steep terrain with many high landslide hazard locations (HLHL) and deeply incised high energy stream systems."



In the Astoria District, Unit 4 of the Buzzard Ridge Combination timber sale will clearcut 99 acres of understory within the viewshed of the Spruce Run campground. Unit 4 has a "moderate" risk of landslides delivering directly into the Nehalem River.

These sales are just a few examples of the pressures to deliver more from these forests than they can bear. Most troubling, however, is the extensive clearcutting of lands designated to become complex. I ask myself, "Why is ODF clearcutting large tracts of forest that are designated to become complex forest structure?" This is what I found in the "Landscape Design" section of the Tillamook 2009 AOP. "The stands shown as complex structure were identified as having the potential to move most quickly toward complex structure." The FMP's plain language does not support clearcutting these forest. The AOP goes on to say "...stand designations are being re-assessed and will be formally modified with an IP revision."

As the ODF has stated the current Implementation Plans (IPs) are in place for 10 years. These IPs were approved 5 years ago and are not due to be "modified" for 5 years. I understand that the BOF is currently considering possible revisions to the FMP, but those revisions are neither drafted nor approved. Is the Tillamook District now ignoring the landscape design approved in 2003, clearcutting stands designated to become complex, and then saying they will change the maps at some future date? Sure looks that way.

In summary, as I look over the many sales in the 2009 Annual Operating Plans, it is obvious that many are coming at the expense multiple values noted in the administrative rule. Forest types that are increasingly rare in the industrial tree-farms that dominate the northern coast range are being clearcut. Moreover, many clearcuts are on steep slopes above fishbearing streams. The utter disregard for landscape design shown by these proposals from the Tillamook District threatens the fundamentals of the long-term plan. These 2009 AOPs threaten ODF's social license to manage for the greatest permanent value.

Despite the harms caused by the 2009 sales at current harvest levels, the BOF is now calling for study of a 30-35% increase in revenue to the governments -- which will inevitably mean significant increases in timber harvests. There is no way ODF can do that without significantly degrading the environment. Our members will certainly oppose the expansion of even more elements of the industrial tree-farm model to these public lands.

Thank you for the opportunity to address you today.

Donald Fontenot
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Oregon Chapter Sierra Club