



Comments to the Oregon Board of Forestry
Ivan Maluski – Oregon Chapter Sierra Club
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Greetings, and thank you for the opportunity to provide public testimony this morning. The Sierra Club has long had an interest in the Tillamook and Clatsop State forests. Many of our roughly 24,000 members in Oregon frequent these forests and utilize them for recreation, as well as habitat benefits they provide for fish, game and threatened species. Some of our members receive drinking water from sources that emerge in our state forests.

But the Sierra Club has grown increasingly concerned with the Board of Forestry's ambitions to raise harvest levels by as much as 35%. Aerial photos already show that lands on the north coast are increasingly moving toward short-rotation industrial forestry. Because of a lack of federal land on the north coast, the state forests are the only significant chunk of public land that can provide a multitude of values and an alternative to the environmental and social impacts associated with short-rotation industrial forestry. Any proposal that the Board is considering to raise harvest levels must include a specific biological analysis of the costs and benefits to species of concern of such a harvest increase. It is up to this Board to take a leadership role in helping to recover species of concern.

Regarding recreation, please consider the Sierra Club a partner in our commitment to promoting and enhancing recreation opportunities in our state forests. The population of the nearby Portland metro area is growing rapidly. The Oregon Department of Forestry needs an ambitious plan that meets commensurate growing recreation needs. The Recreation Management Assessment for Northwest Oregon State Forests from May 2007 makes it clear that the ODF has much work to do to develop such a coherent plan. Until the ODF has developed such a plan, it will be hard to implement forest management plan changes that adequately account for recreation needs.

The current plan for the Tillamook and Clatsop is a compromise. The Sierra Club will not support plan changes that are detrimental to fish and wildlife. At the same time, we^{are} happy to explore and support modifications that do a better job protecting fish, wildlife and water quality, while also providing wins for the counties.

In conclusion, the recent storm events are a clear reminder that current forest practice rules and forest road infrastructure pose a threat to fish, wildlife, water and property during strong storms and heavy rains. Many lessons that should have been learned after the floods of 1996 appear to have been ignored and the result has been catastrophic this past year. We urge this Board not to allow this issue to be swept under the rug and for you to consider adopting reforms on rules for steep slope logging, greater scrutiny and public review on proposals for logging in landslide prone areas, and other necessary reforms that can better protect public health, safety, property and habitat from similar catastrophic events in the future.

Thank you for your time today.