

September 9, 2009

To: Oregon Board of Forestry

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Subject: Revision of the NWFMP

The Board is about to embark on a major undertaking to revise the Northwest Forest Management Plan. However, the proposed revisions, to be outlined later by Mike Cafferata, may only be "the first shoe." This work has been described as "only interim measures that still follow the current FMP."

Existing forest Management Plans are founded on *assumptions that have not born true*. For that reason the fundamental policy framework that defines greatest permanent value in administrative rules should be questioned and revised appropriately. (See July 2009 paper that lists the actions to be taken as a result of the Board's decisions at the June meeting.)

As I reviewed Board material over the past year, the only assumptions that seemed to meet these criteria relate to the perception that expected economic output has fallen short of expectations, thus, social, economic and social values need to be "rebalanced."

Before you set in motion what I regard as I major shift in state forest management that may have *many unintended consequences*, I urge you to consider the following:

1. The current FMP is an impressive document that took many years of effort on the part of hundreds of employees, consultants, scientists and citizens.
2. While not perfect, you only have to tour the Clatsop and Tillamook forests to see many positive improvements that have been driven by this plan. *The majority of assumptions in the Plan are working.*
3. Public surveys over recent years show impressive support for the department and the balanced approach that this plan represents.
4. The approach you are taking is *issue-driven, not goal-driven as the current plan is*. The pitfalls of the approach this Board is taking are given in the NWFMP:

In contrast, an issue-driven plan begins by identifying concerns about existing management practices. It then works to analyze and address those concerns. This is usually done by developing a series of alternatives that deal with the issues in a piecemeal fashion. The problem with an issue-driven process is that it is easy to lose sight of the goals for managing the land. (See Guiding Principle 10, pg. 3-6)

5. As I pointed out in my November 2008 BOF testimony, the five year average timber harvest for the Astoria District was *40% over the mid-point of the Implementation Plan target*, Forest Grove was 9% under and Tillamook was 7%

under. As you know, there are structural and environmental impediments that have prevented higher harvest levels in the Tillamook State Forest. For similar reasons, only Clatsop State Forest will come close to meeting the revised Plan target levels.

6. It is impossible to understand the ramifications of the revised FMP without knowing its impact on the ground. Yet one of the revisions in the material presented today removes public review of Implementation Plans when there are major changes in the FMP. (See Agenda Item 2A, Attachment A v2, p.17) This does not bode well for an open and transparent public process or for maintaining public support.
7. The current recession and subsequent decline in timber prices have created real hardships for the department and the counties. The *current FMP* sets priorities for conducting department activities in periods of time when revenues limit funding:
 1. Legally or contractually required activities.
 2. Minimum activities necessary to achieve the social, economic, and environmental benefits identified in OAR 629-035-0020, including high priority monitoring activities, while emphasizing activities with higher economic return.
 3. Fully implement all strategies and monitoring plans

Implementation plans and operation plans will identify the activities that will be pursued within given time periods based on the anticipated funding levels. (p. 5-3)

Recommendations

- I would much rather see the Board and/or department follow the priorities listed in number 7 above or, if these steps are not sufficient, seek emergency authority to deviate from the current FMP for 1-3 years, rather than discard it without adequate consideration and review. (This action would also provide major relief to a staff that is already stretched thin.)
- I urge you to be open about the inequity among the Districts in terms of their contribution to proposed increased harvest levels. Please do not forget that
 - 1) Unlike the other Districts, Clatsop County has no other only public forestland.
 - 2) Unlike other Districts, the Astoria District has seen a 70% decline in northern spotted owls over the past 10 years. (See table – next page)
 - 3) Last month, 140,000 acres of land in Clatsop County were sold by Weyerhaeuser to an entity affiliated with Campbell Group, a Portland-based timberland investment company. The uncertainties associated with this sale, along with the impact of climate change and recent storms, should be included in your deliberations.

The decisions you are about to make are too important and long-lasting to rush. I think the public will accept short-term measures, if they are explained well. I would not consider this path a "retreat" or "cop-out", rather a prudent step in the face of many uncertainties.

Thank you for your consideration.

Carolyn Eady.

Spotted Owls on NW Oregon State Forests*
1999/2008

Districts	On ODF Land		Adjacent To ODF		Total Sites	Total Owls
	Pair Sites	Single Sites	Pair Sites	Singles Sites		
Astoria	7/3	2/0	1/0	0/0	10/3	17/6
Tillamook	1/2	1/1	0/3	1/3	3/9	4/14
Forest Grove	1/1	2/1	0/0	0/1	3/3	4/4
West Oregon	0/2	0/1	7/7	0/4	7/14	14/23
Western Lane	8/5	0/1	41/51	3/10	52/67	101/123
Clackamas/ Marion	3/7	3/2	12/10	4/4	22/23	37/40
Total	20/20	8/6	61/71	8/22	97/119	178/210

*Derived from updated Table 2-2 (Agenda 2A, Attachment A v2, p. 7)