



North Coast State Forest Coalition

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To the Board of Forestry Subcommittee on Alternative Management Plans:

My name is Bob Van Dyk, and I work for the Wild Salmon Center. Thank you for the opportunity to present these comments on behalf of the North Coast State Forest Coalition, which represents seven organizations focused on ensuring strong, durable, and visible conservation measures on our state-owned forests. Our work has been endorsed by thousands of Oregonians and more than 100 businesses.

Last September our coalition supported the Board's decision to explore whether a land allocation approach could attain the dual goals of increased conservation and increased financial viability. We expressed some skepticism as to whether it was possible to develop a plan that made substantial and positive differences in both these goals, but we were open to analyzing new options. In particular, we requested that a zoned approach make clear that some of the areas designated for conservation were visible and durable, and that in accordance with the Science Teams' recommendations, ODF coordinate with neighboring public landowners, such as the Bureau of Land Management, to consider how to attain complementary conservation strategies across the landscape.

For the January meeting of this committee, ODF prepared a draft of a new plan that included an initial expression of what a new map would look like. Much to our surprise, in meeting with ODF, they could not identify any clear conservation improvements in their draft vision. In addition, staff made clear that under no circumstances would there be any increase in durability in the plan. We strongly objected to this approach, and were glad to see that it lacked support on this committee to move forward. The fact that staff could prepare a plan that did not increase conservation in response to a directive to increase conservation was discouraging to our coalition.

Since then, your committee has been more active in defining an initial set of parameters to model in order to explore whether a new FMP can meet the twin goals. Today we see the results of some of that modeling, and offer several comments.

- 1) No Clear Conservation Benefit Yet: In the materials to date, we have not been able to identify any clear conservation improvements that are under discussion. Through the stakeholder process, our coalition identified numerous potential improvements for conservation, including increased durability. We do appreciate that the Board has shown interest in reserving 30% of the forest for old growth, but it is not clear yet where that designation will be located, whether it will have durability, and whether it will lead to conservation improvements. It is also not clear how that designation is reflected in recent modeling. Regarding salmon habitat, no clear improvement in strategy is currently under discussion, and there may be some increased threat to salmon from increased harvest and associated road construction in the harvest zone. *We ask*

A coalition of conservation and fishing groups working together for a balanced plan to protect the Tillamook and Clatsop State Forests' natural legacy.

Association of NW Steelheaders ~ Native Fish Society ~ Oregon Chapter Sierra Club
Oregon Council Trout Unlimited ~ Pacific Rivers Council
Northwest Guides and Anglers Association ~ Wild Salmon Center

the subcommittee to direct ODF to present potential conservation improvements in the next meeting.

- 2) A Comparative Approach is Needed: In order to understand whether a new plan is superior to the current FMP, direct comparisons need to be made between the current plan and possible new plans. Without a direct comparison, it will not be possible to say whether movement on the twin goals is positive or negative. In recent conversations with staff, we conveyed our view that such a comparative approach was needed, and that ODF ought to present updated model results for the current forest plan, taking into account the numerous improvements in data and changes on the landscape since the current plan was last modeled. ODF staff said they preferred to have direction from the Board to provide such comparative modeling. We have been pleased to work with ODF staff on a discussion of indicators, and look forward to continuing to do so. *We ask that the subcommittee direct staff to provide model results of new plans in a direct comparison with the existing plans.*
- 3) Realistic Cost Projections: In recent comments we have asked the Board to ensure that future costs of the state forest program are adequately assessed in the ongoing discussion. We are not confident that such costs have been appropriately accounted for to date. Part way through this process, ODF staff significantly increased their estimate for future costs when they realized inflation had not been taken into account. More recently, legal decisions regarding retirement obligations may have affected costs. In addition, increased harvests will cost money to implement, and depending on timber prices and harvest type/location, such harvest may not cover increased costs. In summary, then, *we ask the committee to direct staff to offer clear and well-documented estimates of the cost of future state forest management.*
- 4) Conservation Definitions: We are not clear about the purpose of the document defining conservation that was included in the subcommittee materials. From our view, the current GPV and current FMP contain a variety of statements and goals regarding conservation outcomes, and from our view these materials present sufficient information to develop a set of indicators to assess the effects of alternative management practices on conservation. In addition, the specific language offered by the conservation-definition materials omits key standards that are currently in GPV. For example, GPV currently requires that plans restore properly functioning aquatic systems. But ODF's documents only discuss maintaining and enhancing current conditions, not restoring. GPV requires that plans enhance wildlife habitat, but ODF's document only requires protecting and maintaining current conditions. Should there be a need to revisit and possibly revise conservation definitions, we think it should be done through a clear process that honors current GPV and also presents any changes in a comparative context. But we do not believe such work should be a priority now. *We ask the subcommittee to defer the discussion of a conservation definition, and to focus instead on developing indicators and a tentative landscape design.*
- 5) Maps: As our coalition, Board members, and others have noted, there is serious public interest in seeing maps that specifically identify locations that would have conservation designations and harvest designations. Materials presented to the subcommittee show potential harvest levels, but do not show where those harvests would take place. *We ask that the subcommittee direct staff to provide tentative maps of strategies when they next present model results.*

- 6) Modeling and Presentation of Results: ODF has assembled a team of stakeholders representing the counties, timber interests, and the conservation community in order to obtain feedback and a common understanding of the modeling methods. We commend ODF for their work on this effort. We do, however, wish to highlight the need for caution in the presentation of results. In the materials presented to the subcommittee today, for example, there are very specific projections on potential future revenues for many decades to come. It is not clear to us what estimates went into these projections, and the farther the projections move out in time, the more uncertainty there is about their accuracy. *So, we encourage the Board to ask for model results that show a confidence interval or range of error that is associated with predictions.*

Thank you again for the opportunity to address you today.

