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**Land Allocation Concept Process**  
**Alternative Forest Plan – Northwest State Forests**

Written Comment Submitted by Rex Storm  
before the Oregon Board of Forestry -- Subcommittee on Alternative State Forest Plan  
October 19, 2015 –Salem, Oregon

Board Subcommittee members and State Forester Decker, my name is Rex Storm, Forest Policy Manager/Certified Forester for Associated Oregon Loggers (AOL). I make these comments on behalf of 1,000 member companies of AOL, representing Oregon logging, forestry, transportation, construction, and allied forest management firms. AOL members provide services to manage public and private forests, including Northwest Oregon's state forests. Some members are state forest contract purchasers. Your consideration of a new State Forest Plan is of critical concern to our work.

As stakeholders in state forest management, AOL offers a unique voice because contract operators in their daily performance implement benefits for all—including the Department, timber purchasers, local governments, concerned neighbors, taxpayers, and interested publics. This unique operator position is an integral intersection between management practices and attainment of forest plan goals.

**We urge the Subcommittee to refocus the Department's land allocation concept process, to strengthen the "production" concepts and metrics, which are critically-important to achieving long-term revenue/economic/social objectives of the forest sector, counties, and taxing districts.**

We are concerned that the Department and Board are proceeding in a State Forest Plan direction that would fail to significantly improve future forest resource outcomes. This failure would over the long-term deny the necessary sustainable revenue and conservation outcomes. It appears that the planning process continues to be encumbered by a presumed preeminence of ecological values that unnecessarily stifle production values. We recommend the following concepts that may help the Board synthesize a new forest plan allocation strategy that would achieve an improved blend of production and conservation values.

**A. Seeking great improvement in production.** It behooves us all to keep foremost in our consideration that the Forest Management Plan for 15 years has underperformed its intended revenue and production goals—goals so important to the forest sector, counties, taxing districts, communities, and Oregon taxpayers. This has created a production deficit/backlog, plus unintended consequences.

**B. Affirm a new paradigm: maximize production on some acres.** The customary public forest planning thesis has been "restricting production" on all acres. The cumulative effect of additive layers of restrictions is never thoroughly weighed, in terms of their impact on production. We urge a *new paradigm*: optimize production and include maximum production on some areas of the forest. Some portion of the "Production Zone" should be allocated to maximize the production metrics.

**C. Equitable among counties.** Within each county the allocation of zone acres (both production & conservation) must be balanced to achieve an equitable production ratio for each county. The stated *Policy Choices* in Attachment A, fails to achieve this critical balancing of production revenue.

**D. "Financial viability" must optimize revenue outcomes.** The current revenue goal is unacceptably-low—as it would barely achieve state forest program FDF fiscal viability. This is not enough to sustain and accomplish the state forest trust mandate for the county & local taxing district revenue, nor the forest sector production/timber volume. The revenue and production goals should be redefined to optimize or maximize revenue outcomes over the long-term.

**E. Policy choices need explicit “Production Goals”.** The policy choices stated in *Attachment A* fail to reaffirm important production metrics that would “function together to optimize value...” Although production metrics and policy choices may be implicit or stated elsewhere, their absence—in Attachment A, “policy choices,” and “overarching parameters governing the model...”—appears to imply a bias by omission.

**F. Departure to address imbalanced forest condition.** The even-flow goal policy choice would be overly-limiting toward reaching desired future conditions for production & conservation. There’s a need to accelerate near-term harvest to regenerate slow-growing stands that impact future performance through threatened species encumbrances. A production deficit/backlog has resulted from 15 years of FMP underperformance.

**G. ‘Take Avoidance’ measures warrant revision.** We suggest that ODF develop alternative take avoidance strategies surrounding ESA listed species management. The current guidelines are a detrimental overreach for effective FMP implementation. We urge a revised take avoidance strategy similar to the private lands strategy in Oregon. Such revision would offer greater certainty to future plan timber and forest management outcomes.

**H. Policy choices appear to demonstrate a preeminence of conservation values.** There is a persistent theme through panning that places preeminence on ecological values, elevating those values above all other goals and objectives. This apparent preferential status among the plan development—policy choices, model methodology, model data, and prescriptions—would render a harmful impact on planned outcomes and model outputs. A more effective way to address competing values would be to weigh certain key economic and ecologic values relative to their priority—through an optimization process. Examples of this ecological bias are observed in how those values are mischaracterized in the following: “emphasis areas are primarily comprised of areas that are difficult to adjust” (inoperable; FPA wildlife & public safety; prevent take; FMP riparian buffers and inner gorges); conservation metrics modeling assessment of interaction & risk between conservation and production is faulty and biased; legacy retention in production area assessment postulates unduly critical bias and discrimination against scientifically-founded and beneficial practices; among others.

**I. Model data—inventory and yield flaw.** A significant concern is an inexplicably-low starting point timber stand inventory, and the unrealistically-low growth and yield projections. One suggestion to improve the utility of the model data would be to work with the Technical Expert Review Group to correct the flaws.

**J. Model methodology—operational costs flaw.** One suggestion to improve the relative utility of the operational costs in the policy choices would be to correct a flaw in the logging cost model rules. Current rules fail to consider the significant costs of harvest surrounding high numbers of leave trees.

**K. Redress the underproductive stands.** We urge reassignment of some lands into a new status of underperforming productive state, which would warrant remedy to advance those lands toward desired future conditions. These lands might be considered a “backlog”, because the means to achieve desired conditions are challenging. Such “underproductive” acreage could include:

- Tillamook Burn poorly stocked areas, yet site capable of good yield; salvage road replacement
- Alder legacy spray-damaged areas; Swiss needle cast decline
- Remote areas having costly access development; recreation/administrative road access needs

**L. Rapid restoration after catastrophic damage.** There is a clear need to codify specific authority to issue prompt/timely re-assignment or treatment of lands following forest-damaging events—that are known to periodically occur. Such urgent “rapid restoration” acreage could include post-damage events, including: wildfires; wind & ice storms; pest & disease; floods & landslides; public safety situations; interface fire protection needs; easement & special use needs; protection/ recreation/ administrative situations.

**M. Refocus on every acre.** Our planning creed must be, “not every objective can be accomplished on every acre; while optimizing the sum of all acres.” This implies that every acre counts, but that we can optimize outcomes by improving outputs from each acre assigned a clear purpose within a production or conservation.

Thank you for the opportunity to comment. We look forward to cooperating with the Department and Board.