



Chair Imeson, State Forester Decker, members of the board, for the record my name is Seth Barnes and I am the Director of Forest Policy at the Oregon Forest & Industries Council.

Thank you for the opportunity to spend a minute to voice concern regarding the departments engagement with ESSA and the growth and yield review that will shortly be underway. In talks with department staff, and as presented by the department in several related meetings, I have been told that this review comes as a next step to the Technical Expert Review Group (TERG) exercise that was undertaken last fall. I have been told that the basic idea is to find answers to the questions raised by some of the members of the TERG. With that understanding I think it would be prudent for us to remember the stated goal and purpose of the TERG exercise.

“The goal of the group is to review the model, data, and analysis in order to **build confidence** in the modeling work and outputs. This will provide ***assurance to the stakeholders*** involved that the Board of Forestry is being provided reliable information for decision-making.”¹

The goal was to build confidence around the table that this highly technical process was being done using sound principles of biometrics and forest modeling. A significant investment was made to provide highly capable tacticians, from right here in Oregon, to inform all of the parties involved. I sat in the first meeting of this group and can attest to the mutual respect of the three individuals at that table. We had hoped that the engagement would result in the confidence and assurance for which we were all looking. Sadly, from my perspective, as well as others I’ve spoken with, that process was cut short pre-maturely. The TERG was only allowed to fulfill a portion of its work, some of which has now been contracted to ESSA. My concern moving forward is that we not lose sight of the stated purpose of this exercise; to produce confidence in the numbers provided. We will always have lively discussion about tradeoffs and values, but absent that confidence you, and all of us around this table, will never be able to adequately get beyond the numbers to discuss the merits of what they represent. The only way to salvage this process and achieve a measure of that original goal is to integrate the work that ESSA is conducting with the original work of the TERG. And it can’t be just a one-time report, it must be a meaningful engagement in order to achieve the confidence needed to move the process forward.

¹ Technical Expert Review Group Project Charter, July 10, 2015.

I highly recommend that this board direct the department to create a process of meaningful interaction wherein the ESSA consultants be invited to engage with the members of the TERG to review their work and ensure sound resolution to the questions and concerns that have been raised. Furthermore, direct the TERG to finish the work they started; as model runs are produced, allow these experts access to review how the variables are listed and analyzed to ensure accurate understanding and reporting of the outcomes. Absent this type of engagement I fear all parties will be left second guessing these fundamental elements, and the hopeful goal of the TERG will be left unfulfilled. Simply stated I'm requesting that the parties be allowed a chance to complete the process and fulfil, as much as possible, their original goal.



Chair Imeson, State Forest Decker, and board of forestry members, for the record my name is Seth Barnes and as you know I represent the Oregon Forest and Industries Council, serving as the Director of Forest Policy.

I want to comment today on the State Lands Forest Management Planning effort, namely the information that was recently provided to the Board of Forestry (BOF) subcommittee at its October 19th meeting.

As many of you know, following that subcommittee meeting we sent a letter to Chair Imeson, the subcommittee members, the governor's office, and State Forester Decker regarding this issue. I am providing copies of the letter for all of you here with my testimony today. I will be brief with my comments, however, I urge you to read the letter provided.

The issue before us has to do with determining the baseline information from which we can begin to discuss management options for this forest. You can't consider trade-offs until you have a good understanding of the facts as they stand today. The modeling effort underway by the Department of Forestry (ODF) staff is crucial in providing that baseline. At the request of ODF, OFIC contracted with an expert in the field of biometrics and forest modeling to participate with two other experts in an effort to review and improve the modeling. These experts have extensive resumes and work histories, spanning from public to private clients all over the Pacific Northwest and beyond. These individuals make up the Technical Expert Review Group (TERG). Engaging subject matter experts of this magnitude and experience has the potential to significantly improve the accuracy of the model and the confidence of all parties involved. Their involvement is all for not, however, if the department fails to follow through with the critical information they provided.

At the October subcommittee meeting they provided important information regarding the foundation of the modeling exercise. They informed the department that their starting inventory was too low, their estimates of soil growth capacity were too low, and their projections of forest growth and yield were too low:

1. The starting inventory for the model has been lowered dramatically, 12-15% reduction in standing volume! Or nearly 2 Billion board feet!
2. The model is currently using information regarding soil productivity that is artificially low when compared to real existing soil data. Using estimates from models as a surrogate for measured soil quality is not acceptable, especially where actual data is available.
3. Future growth yields should be estimated at higher rates than what are currently modeled. Growth projections in this model are lower than ones used for this same forest over a decade ago. Current forestry consistently outperforms past projections of growth throughout the region.

The TERG provided other suggestions, I focus on these three because they are so significant.

We feel strongly that the foundation of the model used in this process should be without bias or imbedded with policy calls. This is about inventory and growth potential of the forest. It is our opportunity to view the facts as they stand. Every effort should be made to be as accurate as possible in the modeling effort, not overly ambitious or conservative, but accurate. It was our understanding that this was in fact the purpose of the TERG itself, to share insights from experts in this field in order have shared confidence in the model. There will be a time and place to argue the merits of given tradeoffs from policy considerations, but this foundation is not the place for these discussions.

To this day, the department has not said how or when they intend to address the information provided by the TERG. As outlined in our letter, the department must be clearly directed to follow-through on the TERG input. At this point there are no other priorities that should be higher than responding to these concerns and incorporating the suggested revisions put forward by these experts. The summaries of the previously modeled outputs regarding volume projections, revenue calculations, as well as conservation outputs is, in our opinion, entirely meaningless given the magnitude of the information provided by the TERG.

Furthermore, as a point of information for this board, while attending the FTLAC meeting last week we heard that the department will be considering a 52/48 plan as they look to incorporate a "third zone approach". How can we be considering a third zone if we don't even have a solid model of outputs from the 70/30 plan?

The department must be directed to adhere to the concept of the 70/30 compromise. Fix the model as suggested by the TERG members, and remove imbedded policy decisions within the model. Once these corrections have been made, run the model again, this will allow us to see where the 70/30 compromise truly gets us. We firmly believe that this has tremendous potential to meet and exceed our goals of financial viability and conservation uplift.

Thank you,

Seth A. Barnes
Director of Forest Policy
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