

August 12, 2015

Testimony before the Board of Forestry Subcommittee on Alternative Forest Management Plans for Northwest State Forests

As we already know 49% of the State Forest Trust Lands are encumbered by some kind of management objective and/or land allocation that limits harvest opportunities, under the current plan. The current plan must be revised to come up to the 70% allocated to timber emphasis. The current draft appears to be moving in that direction

Here are FTLAC's recommendations.

Otherwise unconstrained inoperable areas. This is 6% of the total acreage under the plan and should be considered available for harvest due to their unknown conservation benefits. They include:

- 1,565 acres in Terrestrial Anchors and it should be noted that:
  - Terrestrial Anchors were created to garner support for the FMP
  - And the Trask Paired Watershed Study indicates healthy stream conditions and healthy fish.
- 11,332 acres are designated as DFC – Complex.
  - This desired future condition is part of the current plan. The Board already decided to go in a different direction.
- It's important to note that 91% of unconstrained inoperable areas are in the Tillamook and Forest Grove Districts.
- If these areas are and will be considered inoperable due to high operational costs, then they should be allocated to the 30% conservation emphasis areas, which would free up more of the timber emphasis areas for higher productivity.

Desired future condition for Conservation Emphasis Areas as old growth:

- We remain concerned about the long-term impacts of T&E constraints bleeding into production emphasis areas.
- It's important to note that "*Conservation is the maintenance of essential ecological processes, preservation of genetic diversity, and sustainable use of species and ecosystems across the landscape.*"

Harvest Volumes over time appear to be pretty modest.

- In 2014 harvest volumes were 220,859 MBF
- By comparison, 2010 harvest volumes were 268,142 MBF
- However, the current draft only shows a harvest level of 300 MBF after a gradual ramp-up for 45 years.
- Then the modeling indicates that harvest levels start to drop significantly

Secondly, the projected harvest Volumes are for the entire state forests

- We have no way as yet of gauging the relative per county impacts

And finally, the gradual harvest level increases indicate reliance on even-flow practices. For the Production Emphasis areas to fully perform as anticipated, they *must* be harvested under a regime of *significant* departure from even-flow practices.

- Not departing from even-flow practices will result in old-growth tree stands in the production areas
  - Which have questionable commercial desirability and
  - And will increase the likelihood of T&E constraints.

We have two requests:

1. We would like to see a document similar to Attachment E specifying the goals, objectives, management strategies and implementation measures outlining a baseline for success for Timber Emphasis areas.

This document should also address FTLAC's long-standing view that the Timber Emphasis areas should provide as much volume as possible – not just the level needed to keep ODF in the black.

2. Prepare a document that integrates the direction on the Timber Emphasis areas and the Conservation Emphasis areas and show how the two are balanced under the GPV. This document should state that conservation areas will provide a variety of habitats – not just old growth habitat.

Attachment D – Model Rules and our position at this time:

- Stand Management: Concur
- Young Stand Management: Concur
- Current FMP stream buffers:

- We are on record supporting FPA Stream buffers. However, ongoing deliberations preclude us from commenting further at this time.
- Scale of Planning Unit:
  - It's difficult for us to give our support without knowing the impacts on individual counties and districts.
- Minimum Value Requirement: Concur
- Minimum regeneration harvest age: Concur
- FPA rules for upland areas, including green tree retention requirements: Concur
- No harvest on old-growth stands:
  - While the immediate impacts are low, T&E implications over time may create constraints within Production Emphasis areas.
  - And may have Tillamook One legal implications.

Attachment E – Conservation Strategies reads in part:

*“Designation of some lands for production or conservation may change over time as circumstances change on the landscape. Re-designation of areas will ensure financial viability goals are met over time along with the goal to increase conservation.”*

- We agree with this statement.
  - This practice will produce true durability and
  - Will not violate our legal rights established in Tillamook One
- We however object to language – especially regarding old-growth – that appears to take away forever any consideration of harvest on these lands. We view this proposed restriction as a potential violation of Tillamook One.

Conclusion: It's premature for us to endorse this early run. However, we urge the Sub-Committee to refrain from burdensome additional analysis that will only serve to delay the process.

We are also looking forward to analysis showing that ODF has minimized the risk of impacts emanating from older forest stands.

And finally, we are disappointed in the projected harvest levels. We're looking forward to analysis showing what the biological potential is for harvest levels.

Tim Josi, Chair FTLAC & CFTLC