

April 25, 2017

To the Oregon Board of Forestry:

My name is Tara Brown and I am here on behalf of the Oregon Forest Conservation Coalition. Our coalition is committed to balanced and sustainable state forest management that protects clean water, wildlife habitat, and special places to recreate in, as well as timber harvest.

I am a new addition to the coalition and am still learning about the Northwest Oregon Forest Management Plan. Recently, I have been out hiking in the Tillamook and Clatsop State Forests and exploring some of the 2019 proposed Annual Operation Plans.

One operation that I visited is located in a Terrestrial Anchor Site (TAS). From my understanding, these areas are supposed to be managed for conservation, specifically to benefit terrestrial wildlife through maintaining complex forest structures and avoiding forest fragmentation.

I visited the Bastard Creek Terrestrial Anchor, which contains a proposed timber sale (Woody Woodpecker) in complex forest habitat. The sale proposes extensive thinning and would create several new road segments that would punch through this old complex stand. Additionally, this Terrestrial Anchor is in an area with some of the highest concentration of marbled murrelet habitat on state forests, which in my world means extra prudence should be taken in management activities.

I was especially surprised that there had been no Biological Assessment performed for this extensive operation in a Terrestrial Anchor Site, which is supposed to be considered a High Valued Conservation Area. There was no detailed analysis of the way in which the proposed treatment would advance older forest habitat, nor a description of the potential effects that extensive new roads would have on the stand. However, I did see a Biological Assessment for activities in a murrelet management area nearby. It seems to me that a Biological Assessment should be provided to create public confidence in the purpose and necessity of a timber sale within a Terrestrial Anchor Site.

I am also surprised to see that there is almost 33 miles of new road construction proposed in the 2019 Annual Operations Plans.¹ As I examine recent operating plans, it seems that ODF is in the midst of a broad, major, and systemic expansion of the road network and has added hundreds of miles of roads across the landscape since the 2001 FMP was approved.

1) Oregon Department of Forestry, Oregon State Forests 2019 Annual Operations Plans, Forest Roads Management.