Tillamook County

Board of Commissioners
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Land of Cheese, Trees and Ocean Breeze

July 18, 2018

Re: Oregon Board of Forestry Testimony

Dear Board of Forestry:

At previous Board of Forestry (BOF) meetings, we noted concern that the Oregon Department of Forestry (ODF) seems to be pursuing a planning process that will not provide the BOF with alternative forest plans. Tillamook County still believes this is a mistake. Reviewing viable alternatives is a natural way to make decisions, especially in a public process, and we still don't understand how the BOF thinks it can make rational decisions without understanding the alternatives.

At the last meeting, the BOF seemed to be asking ODF to provide some measurable objectives for the forest plan. It is appropriate for the BOF to inquire as to how much timber and revenue will be produced and how much habitat affected. We agree that the BOF should understand the consequences of the plan. These are good questions and the BOF is asking them. ODF's response to the BOF inquiries is to add "measurable outcomes" and "quantifiable targets" to "Table 2: hypothetical examples." As shown in this table, these are acre-level standards describing how many trees per acre will be left.

We don't believe this table format answers the BOF questions, or if it does, the BOF is not asking the right questions. How can you make a forest plan decision without understanding what the results of the plan will be in terms of total outputs?

While we applaud the idea of stating each strategy in terms of more specific outputs, it would also be good to show the impacts in more specific terms than the arrows and circles suggested by ODF. Shouldn't the BOF understand the impacts in a quantifiable way before making decisions? Wouldn't you approach, for example, a green tree retention standard differently if you knew one standard would cost one thousand board feet or $350 per acre or $1.4 million per year versus another standard that would cost three thousand board feet or $1,400 per acre or $5.6 million per year? As public officials, we sure would.

Sincerely,

BOARD OF COMMISSIONERS FOR TILLAMOOK COUNTY, OREGON

Tim Josi, Chair

David Yamamoto, Vice Chair

Bill Baertlein, Commissioner

Table 2. Hypothetical example for an impacts analysis to compare the current Forest Management Plan to a proposed alternative utilizing the 2014 Independent Science Panel evaluation approach.

GPV (OAR 629-035-0020)	Goal [OAR 629-035-0030(2)(c)]	Strategy [OAR 629-035-0030(2)(d)]	Current Plan	Proposed Alternative	Predicted Impacts (GPV)	Impacts
(2)(b) Protects, maintains, and enhances native wildlife habitats;	Contribute to a range of wildlife habitat types.	Incorporate legacy structure at a landscape level.	Retain Green Trees in Clearcuts	*Change Green Tree Retention for Economic Outcomes*	Economic: Beneficial increase; low certainty	↑
					Environmental: Mixed changes; less certainty	⇔
					Social: No significant change	=
(2)(a) Results in a high probability of maintaining and restoring properly functioning aquatic habitats for salmonids, and other native fish and aquatic life;	Contribute to the development of a diversity of habitat for maintaining salmonids & other native fish & wildlife species	Salmon Anchor Habitat Strategy	Apply more restrictive Riparian Buffers in Aquatic Anchors	*Change Riparian Buffer for Environmental Outcomes*	Economic: Detrimental decrease; high certainty	↓
					Environmental: Beneficial increase; high certainty	↑
					Social: No significant change	=

FINDINGS

Guiding principles provide the policy framework of the FMP and are grounded in the direction established in statute and rule for the lands to be managed for Greatest Permanent Value to the state. The meaning of conservation and financial viability are expressed in the guiding principles to establish lasting commitment to financial- and conservation-related policies. Guiding principles together with other planning elements such as goals, strategies, measurable outcomes, and quantifiable targets provide the foundation for a plan that when implemented will meet the stated goals in the context of adaptive management. Decisions to revise the current plan can be informed by an impacts analysis that compares a proposed alternative to the current plan. The analysis will indicate if a changed strategy will increase or decrease desired outcomes, if the impacts will be beneficial or detrimental, and the level of certainty of the analysis.

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Land of Cheese, Trees and Ocean Breeze

July 24, 2018

Dear Board of Forestry:

I have some additional comments that I would like to share with you that I prepared over the weekend. I have not had an opportunity to share this document with my other two commissioners so these comments are solely mine. However, I am confident that, given an opportunity, they would concur with these comments.

I urge you to reconsider your approach to the Guiding Principles document. I suggest you begin by identifying what needs to change to remedy the unsustainable financial circumstances ODF is currently suffering from. From my perspective much of this document is worded so broadly as to be somewhat meaningless and appears to have you double down on the same flawed strategy that is hurting Oregon's rural communities.

I believe the state's obligations to the Trust Counties are much more meaningful and prescriptive than the rule language under Principal 1. This is, in fact, presently the subject of litigation with the state. For this reason, I'm surprised to see you acting on the question now.

Please bear in mind that our rural Oregon communities depend on a robust economic return from the investment these counties made when conveying their lands to the state. My hope is that you will identify the need to amend the FMP in terms of your obligations to the Trust Counties, our schools, our special districts and the family wage jobs that sustain our communities.

Sincerely,

Tim Josi,
Tillamook County Commissioner

Oregon Stream Protection Coalition

Association of Northwest Steelheaders

Audubon Society of Portland

Cascadia Wildlands

Center for Biological Diversity

Coast Range Association

Defenders of Wildlife

Greater Hells Canyon Council

Institute for Fisheries Resources

KS Wild

McKenzie Flyfishers

Native Fish Society

Northwest Environmental Advocates

Northwest Guides and Anglers

Northwest Sportfishing Industry Association

Oregon Wild

Pacific Coast Federation of Fishermen's Associations

Pacific Rivers

Rogue Riverkeeper

Sierra Club

Trout Unlimited

Umpqua Watersheds

Washington Forest Law Center

WaterWatch of Oregon

The Wetlands Conservancy

Wild Earth Guardians

Wild Salmon Center

BEFORE THE OREGON BOARD OF FORESTRY

Agenda Item 1: Public Comment for items not the on the agenda

Statement of the Oregon Stream Protection Coalition

July 24, 2018

Re: Need for Board policy to address Endangered Species Act liability for take of Oregon Coast and other listed salmonids caused by private forest management

The Oregon Stream Protection Coalition's 25 conservation and fishing industry member groups are united in support of stronger, science-based forest practices standards that reliably meet water quality standards and protect aquatic life on Oregon's 10.6 million acres of private forestland.

Recently, a citizen suit was filed under the Endangered Species Act by the Center for Biological Diversity and four other coalition members naming department officials as defendants. The complaint describes harm to Oregon Coast coho and the quality of coho habitat from logging and road building on landslide-prone slopes and without adequate buffers. This harm is the result of logging-caused landslides, depleted wood sources, depletion of large wood sources, and in-stream sedimentation.

Our purpose in testifying today is to make the point that the adverse timber harvest impacts on listed Oregon Coast coho enumerated in the citizen suit are not limited to timber harvest on state lands, and in fact are more severe on the private lands which encompass at least a third of habitat within this species' range and have less protective default management practices. Significantly, NMFS' findings in decision documents supporting the listing of Oregon Coast coho show that "clear-cutting trees on steep, unstable slopes and along debris flow paths" as well as "road construction associated with log-hauling in the Oregon Coast range" adversely affecting coho were not limited to state lands.[i] NOAA and EPA findings that coastal water quality and beneficial uses such as salmon are not adequately protected by existing forestry measures specifically target stream buffers for smaller fish and non-fish-bearing streams, forest roads and high-risk landslide areas.[ii]

Furthermore, these impacts are not limited to Oregon Coast coho and the Coast Range. Southern Oregon Coastal coho and other Columbia River salmonids all have habitat on private forestlands and enjoy ESA protected status. Recovery plans for salmon, steelhead and bull trout stocks specifically target improvement of conditions that are exacerbated by private lands logging.[iii]

The risks posed by unstable slope logging are of particular concern because on both state and private lands harvest is permitted to increase the risk of mass wasting unless public safety risks are identified. We note that Washington state forest practice rules -- and the collaborative negotiated stakeholder agreement underlying them -- state a clear objective that forest practices must "avoid accelerating rates and magnitudes of mass wasting that could deliver sediment or debris to a public resource or could deliver sediment or debris in a manner that would threaten public safety." We propose that Oregon's approach should include a similar objective.