



Chair Imeson, State Forester Dougherty, members of the board, thanks for allowing me time to speak with you again today. For the record my name is Seth Barnes and I am the Director of Forest Policy at the Oregon Forest & Industries Council.

I'm here once again to discuss this iterative step in the quest for a new and improved Forest Management Plan (FMP). You will all recall that what landed us here was a plan that failed on several fronts; first and foremost was a failure to meet the financial and social goals of delivering enough revenue. Let alone not providing sufficient funds to the agency to keep the lights on, it also failed to reach the promised levels of revenue to the counties that depend on these funds for direct input into social services. And it failed to produce harvest levels promised to manufacturers, contractors, communities, and families whose livelihoods depend on sustainable timber volumes produced from these lands. Furthermore, as we sit here in a high severity fire situation, all of us in the industry recognize that a healthy, mission driven, and well-funded Department of Forestry equates to more firefighters and fire managers available when the time is needed. Now is one of those times, and it is painful to see a depleted department struggle to meet the challenge, all while sitting on an asset as currently under-utilized as our state forests.

From another vantage point, the current FMP also failed to produce the ecological values across the landscape. Structure targets in many locations failed to account for natural variability that fought against those particular types of "structure"- not all forests are naturally inclined to become multi-layered. It also failed to recognize the realities of the Federal ESA, where occupied habitat equates to permanent obligations, thus no longer accommodating a plan that would see those "structure types" move across the landscape.

With these reminders now forefront in your in minds, I would urge you to think about how we are moving through this stage of the planning process- how are we doing things differently? I would argue that the principles before you for consideration are very similar to ones that were developed for the previous plan. When will we start to see semblance of a new direction? At what point can we expect to see change, one that seeks to deliver real results, one that has a process to ensure success on these fronts, one that imbeds a level of accountability?

Now I'd like to focus your attention to principle 1, sub-bullet 7 for moment. Perhaps nothing in this document would garner the support from everyone in this room as much as this statement, "*The rules direct that plans be based on best science available, use monitoring and research to generate new information, and an adaptive management approach.*" Few would argue with adaptive management as one of the cornerstones of any good forest management plan. If you were to google search forest management plans around the country or the world, you would find that virtually all of them include an aspect of adaptive management- it is that excepted and relied upon as a tool for planning in a complex environment. Few would also argue that points such as integrated pest management strategies, silvicultural treatments, wetland management areas, riparian strategies, or components of climate change should be common themes to be explored under an adaptive management program. These are appropriate areas for doing such research and monitoring to ensure that the expressed goals of the plan are on target for being achieved. I would now ask you to consider principle 11 regarding climate change.

This principle clearly stands out as an unnecessary appendage- this is only one aspect of an adaptive management program. Recognizing that there are few phrases as loaded and politically charged today than “climate change”, I would recommend to this board that principle 11 be deleted, and instead a sentence be added to principle 1, sub-bullet 7 that recognizes several potential topics to be addressed under an adaptive management approach, one of those being climate change.

The last point I want to highlight for you is with regards to the use of the symbology proposed by the department to give relative comparisons of costs or benefits from different components of a new plan. The use of skinny and fat arrows really means nothing without the accompanying data showing the analysis that resulted in the symbology. I would expect that you, as decision makers, would want to have the actual information so you can determine the significance of the cost or benefit for yourselves, I know we as stakeholders would appreciate that level of transparency from this process. Without it we are all left to speculate what the skinny arrow really means. Furthermore, I would like to reiterate that we continue to believe that these comparisons should be made relative to the Forest Practices Act as a baseline.

Thank you for the opportunity to comment.

Sincerely,

Seth A Barnes, Director of Forest Policy