

To: Oregon Board of Forestry
From: Bob Van Dyk, for Oregon Forest Conservation Coalition and Wild Salmon Center
Date: November 7, 2018
Re: Forest Management Plan Revision

Board members and State Forester Daugherty, my name is Bob Van Dyk, and I work for the Wild Salmon Center and with the Oregon Forest Conservation Coalition. Together our groups represent tens of thousands of Oregonians who want balanced management and durable conservation areas on our state-owned lands.

This testimony addresses the Goals, Strategies, and Outcomes document that staff has prepared as their vision of a new state forest management plan.

We were eager to see this document, as we took it to be a chance to see how ODF staff saw the way forward for a plan to improve conservation outcomes and enhance financial viability.

Unfortunately, we could not understand the staff proposal. The proposal had a great deal of content, of course, but it is unclear how the proposed plan is different from the current plan.

As we read the documents we were left wondering how the revised plan compares to the current plan.

How would it improve financial viability? How would it improve conservation?

We thought that there might also be an explanation of the merit of the staff proposal based on the changes in knowledge since 2001, when the core of the current FMP was approved. For example, does the widespread Swiss need cast infestation merit a new strategy? Does the new science on stream flow decreases in tree plantations merit attention? Are projected patterns of vegetation composition likely to be different due to climate change? Do concerns about the listing of the tree vole merit consideration? Have costs changed in a way that makes current staffing unsustainable? None of these questions were addressed.

This lack of clarity and explanation was disappointing.

The one thing that did seem clear is that ODF proposes that the Board remove some of the specific sideboards that now protect conservation areas. In particular, the staff proposal does not retain commitments to help recover older forest types at a minimum of 30% in each district, as the current plan does. It is not explained why this was dropped.

As a replacement for this conservation commitment, staff provided a very long list of proposed strategies, as well as a plan to have adaptive management and performance measures.

Of course, the current plan includes adaptive management, and the Board has performance measures for the state forests, which it stopped reporting in 2013. As you also know, the

extensive monitoring program that ODF once had is now much diminished, and ODF has returned to reporting on activities rather than on performance measures, presumably due to lower staffing.

Given that ODF faces financial challenges in part because of high staffing costs, we think it unwise that an expansive monitoring program should be the premise of a new plan.

As we have reminded you at earlier Board meetings, ODF is now cutting at record levels and with high timber prices, and yet they continue to project financial hardship. Formal direction from the state forester has prioritized high-value clearcuts over forest operations that represent an investment in the forest. Earlier this year, the state forester approved redesignating 6,000 acres of the Clatsop State Forest in order to ensure high harvest levels can be maintained, despite concerns from staff biologists.

As we have stated in the past, we do not see the current Forest Management Plan as a problem. The fundamental problem is that ODF's costs continue to rise rapidly, and despite record revenue they feel pressure to change the plan to weaken conservation commitments.

To solve this problem, we believe ODF should seek to reduce costs, advocate for more revenues or a different way of sharing existing revenues, and set a path for a Forest Land Transfer program that can incrementally disconnect special areas on the state forests from the revenue-generation pressure.

We are eager to work with you on these solutions, but we cannot today support further work on the alternative FMP, given its lack of clarity, apparent increase of discretion to the ODF managers, and lack of increased conservation. Thank you for your time.