

March 5, 2019

To: Oregon Board of Forestry

From: Carolyn Eady, Astoria, OR 97103

Subject: Written Testimony – March 6, 2018 Meeting – Item 5

I am testifying to express my serious concern about the Forest Plan Project being presented today by the Department:

- The Climate Change provisions deal with the impact of CC on the forests, but is silent on the *impact of the forests on Climate change*, a crucial issue.
- It recognizes the difficulties of achieving the five different stand types in different Zones, but *does not acknowledge the amount of labor required* to shift to one based on habitat definitions, seral stages, and specific habitat conditions (e.g. snags, downed wood, herbaceous vegetation) ... page 4.
- It describes a “regional approach to achieve a range of habitat and conservations outcomes”, but *does not define the impact of this on individual Counties*. Clatsop County, for example, has no federal land to take advantage of complex structure on adjacent lands.
- Under point 6, it describes its use of durable conservation areas, but without an HCP, it requires a larger percent of the forest to be in that condition than was contemplated in the plan unless the shifting mosaic concept is removed. It is *unclear what the impact of this removal will have on the conservation areas*.

The “Vision for the Revised FMP” presents a ‘meeting all needs’ picture, but unless the issues raised above are addressed, and then the plan is presented to the public and various state agencies for review, with their legitimate concerns taken into account, this proposal is not meeting the spirit or intent of the current state regulations and rules.