

March 6, 2019

Oregon Department of Forestry
2600 State Street
Salem, Oregon 97310

RE: Testimony from Meghan Tuttle, Weyerhaeuser Company Western Environmental Affairs Manager on Marbled Murrelet (MAMU) Resource Site Protection Rules

Chair Imeson, State Forester Daugherty and board of forestry (BOF) members, thank you for the opportunity to testify today,

My name is Meghan Tuttle and I am the Western Environmental Affairs Manager at Weyerhaeuser Company. Weyerhaeuser owns 1.6 million acres in Oregon, where we have operated for over 100 years and have 1,000 employees.

We appreciate that the BOF is interested in the OSU's College of Forestry Dean's research initiative on marbled murrelets in relation to the ongoing Forest Practices Rule Analysis for defining resource site protection rules. As noted in OFIC comments, research is critical to better understanding the importance of ocean conditions, as well as the up-land habitat needs of the MAMU.

While supporting research is important, it is also critical the BOF recognize the role the USFWS federal recovery plan plays in Oregon and how those measures should influence future decisions by the BOF regarding MAMU resource site protection rules.

First, the vast majority of MAMU nest sites found in Oregon are associated with the NW Forest Plan's Late Successional Reserve (LSR) designation. LSRs are typically comprised of stands generally 80 years or older.

Second, the federal MAMU recovery plan recognized that virtually all remaining potential MAMU habitat in the Coast range of Oregon is located on Federal lands. The plan also recognized that some potential habitat is likely located on the Elliot state forest. Or the Tillamook state forest in stands ranging from 65-150 years old.

Third, when the MAMU recovery plan attempted to model predicted habitat, it found that only 3% of MAMU habitat would be found on private lands. The recovery plan modeling effort as well as monitoring results associated with the NW forest plan clearly demonstrate the vast majority of actual and predicted habitat is located on state and federal public lands.

Fourth, the federal recovery plan recognizes that species recovery is needed on a landscape level and concluded in Oregon that federal coastal ownership meets this landscape level need. The plan acknowledges that habitat and private forest lands in particular are not the limiting factor for murrelet recovery in Oregon and on page 85 says that "virtually all remaining potential habitat in the Coast Range is on Federal Lands" (USFWS).

Across the murrelet range the plan also says that "approximately 89 percent of the estimated marbled murrelet habitat on Bureau of Land Management and U.S. Forest Service lands is contained within areas designated for protection" (p.83).

In closing, the BOF should take this information into consideration when it decides IF it should develop MAMU resource site protection rules; put simply are MAMU resource site protection rules necessary on private lands? And if they are, the BOF should be guided by a simple fact: the vast majority of MAMU sites are located in stands greater than 80 years old and typically within 30 miles of the Oregon coast.

Sincerely,

Meghan Tuttle, Western Environmental Affairs Manager
Weyerhaeuser Company

US Fish and Wildlife Service (USFWS). 1997. Recovery Plan for the Marbled Murrelet (Washington, Oregon and California Populations). Region 1, US Fish and Wildlife Service, Portland Oregon.