

November 6, 2008

To: Oregon Board of Forestry

From Carolyn Eady
79380 Hwy, 202
Seaside, OR 97138

Introduction

The Board asked ODF to determine the impact of achieving at least 17-20% complex structure over the next 20 years while also achieving a 30-35% increase in annual timber revenue over the next 10 years. The department modeled the complex structure target and resulting timber volume in the Clatsop/Tillamook Forests over the next 80 years; this was called the Performance Model or 'PM'. For comparison purposes, the department also modeled the current Forest Management Plan (FMP) called "Base" using updated and refined criteria.

My purpose today is to show the impact these two model runs will have on the quantity and quality of habitat in the individual districts and to express my serious concerns about the PM model if it is chosen as a future direction for the department. My focus will be on the disparity of impact among the districts.

I know that this modeling project is a "work in progress"; some projections may change. I think it is important, however, to point out some of the serious consequences if you were to choose this direction for the department.

Comparative Data

Table 1 on page 3 summarizes the key structural habitat outcomes for each district and the region for the two models. Table 2 on page 4 summarizes the timber volume by district and the region for the two models. Following are the key findings:

Table 1: Habitat

- **Base** (refined FMP): Each District will make major strides in meeting their complex structure goals in 20 years: Astoria- 41%; Forest Grove (FG)-37%; Tillamook-16%. (See line 1)
- **PM:** Compared to the Base run, Astoria will have 13% less complex structure in 20 years; FG- 15% less and Tillamook about the same in 20 years. In 80 years, *Astoria will have 24% complex structure (vs. 35% in FG and 32% in Tillamook), 4% less than they will have in 20 years.*¹ 24% of their acreage will be REG, with 50% of their total acres less than 40 years old! There will be 4 less patches 520

¹ The PM plan removes landscape design restrictions after 20 years, thus *removing the constraints in the Base Plan* for clearcuts and thinning until 50% complex structure is attained.

acres in size and 3 less patches 2,180 acres in size. (Overall, 40,000 more acres of complex structure acres will be obtained in the first 20 years under the Base Model.)

Table 2: Timber Volume

- **Base:** Line 2 shows that Astoria has been harvesting timber since 2003 at nearly 40% over the mid-point of the 2003 Implementation Plan; FG 9% over and Tillamook 7% under. Given the volume of timber harvested in Astoria this decade, it is not surprising that the model projects a level for Astoria that is 7% below the IP mid-point over the next 20 years. It is less clear to me why FG will be 25% below and Tillamook 23% below their respective mid-points. (See line 1)
- **PM:** Astoria will harvest 32MMBF more timber per year than FG and 22MMBF more than Tillamook. Astoria will be within 5% of meeting the PM target; FG 32% below and Tillamook 23% below.

Conclusions and Recommendations

1. All Districts will have a serious loss of habitat under the PM model, but it is especially severe in the Astoria District. Given this District is virtually surrounded by commercial timberland and there are no federal forests in Clatsop County, the impact on wildlife could be severe.

- No final action should be taken until the species of concern report is available. How else will you know if this direction achieves GPV?

2. While the pressures to increase revenue are especially intense, it should be recognized that the review and rule-making process that must be followed to modify the Management Plans are time consuming; the effects of any actions you may take today may not be realized for several years.

- I urge an accelerated effort to assess alternate sources of non-timber revenue. (See Att. 5, p.3) These may be generated just as quickly and with less controversy than increasing timber production by means of major modifications of the Forest Management and Implementation Plans. I would also recommend that the exploration of minerals should be added to the department's list on non-timber revenue sources.

3. Projecting beyond 20 years may be a futile exercise if there is not a concerted global effort to control greenhouse gas emissions. The role and importance of the state forests in this crucial effort may increase significantly over the next decade.

- Once again, do not let short-term pressures trump wise long-term decisions or eliminate flexibility in the future.

TABLE 1: Summary of Habitat Impact of Base and PM Models by District

Habitat Impact Under Proposed Plans	Astoria		Forest Grove		Tillamook		Region	
	Base	PM	Base	PM	Base	PM	Base	PM
1. Complex Structure in 20 yrs (Currently)	41% (21%)	28%	37% (16%)	22%	16% (8%)	17%	28%	20% (14%)
2. Complex Structure: in 80 yrs	45%	24%	52%	35%	42%	36%	44%	32%
3. Acres >100 yrs. old in 80 years	38%	20%	51%	36%	56%	33%	50%	30%
4. Acres <40 yrs. old in 80 yrs,	31%	50%	34%	NA	35%	NA		42%
5. Acres Reg. In 15 years	5-17%	29%	12%	5-16%	20%	9-24	5-20%	9-29%
6. Acres Reg. In 80 yrs.	10%	24%	13%	17-21%	10%	"as low as 13%"	10-13%	17-21%
7. No. of Patches (size in acres) In 80 years	15 (520) 5 (2180)	11 (520) 2 (2180)	15 (520) 4 (2180)	13(520) 1(2180)	18 (520) 3 (2180)	13 (520) 2 (2180)	48 (520) 12 (2180)	37 (520) 5 (2130)
8. Percent Designated Complex at 20 yrs - Cut in 80 yrs.	0	39%	0	37%	0	26%	0	32% ²

Note: Most of the data by District was obtained from the graphs in Attachment 7. The numbers may be 1 or 2 MMBF off due to a reading error.

² Overall, only 12% of the original complex structure remains in 80 yrs.

TABLE 2: Summary of the Timber Volume in the Base and PM Models by District

Estimated Average Volume MMBF	Astoria		Forest Grove		Tillamook		Region	
	Base	PM	Base	PM	Base	PM	Base	PM
1. 2003 Implem. Plan: mid-point (range)	60.3 (41-76.7)		56.2 (44.9-67.4)		59.9 (49-78.7)		176.4 (134.9-222.8)	
2. 2003-2006 Actual 5 yr. ave. ³ (% over mid-point.)	83.7 (39%)		61.1 (9%)		55.8 (-7%)		200.6 (13.6%)	
3. 2002-2006 5 year avg. AOP Objective	66		57		60		183	
BOF PM: Above figure + 30-35% inc.		86-89		74-77		78-81		238-244
Model Results: 1st 20 Years	56	82	42	50	46	60	144	192
Model Results: Next 60 years	55	84	40	50	45	65	140	200
Base: Variance to I.P. mid-point	-7%		-25%		-23%		-21%	-18%
PM: Variance to PM Target 20 yr.		-5%		-32%		-23		-19%

³ Actual MMBF for the three districts in 2007 and 2008 were: AT 68.8 and 82.7; FG 71 and 59.5; Till 57.2 and 52.2.