

**Comments on the State Forest Management Plan
to the Board of Forestry
from a Diverse Coalition of Organizations
Interested in the Management of State Forests
June 6, 2007**

Good afternoon Board members and State Forester Brown. My name is Bob Van Dyk, and I work for the Wild Salmon Center. Today I am speaking on behalf of a diverse coalition of organizations who represent many thousands of Oregonians. As in April and November of 2006, we have come together today to speak with one voice.

In the materials for today's meeting, the Department recommends that the Board determine whether modifications of the Forest Management Plan (FMP) should be considered. Also recommended is that the Board set targets for the newly adopted performance measures.

While setting targets for this first and incomplete draft of performance measures seems premature, we do not object to consideration of changes in the FMP per se; many of our groups have asked for modifications before today. Moreover, we support the Department's move to consider more passive approaches to management and "greater assurances around the achievement of complex structure in a timely manner."

As you consider the direction of possible changes to the FMP, however, we ask that you bear several things in mind.

First, we continue to support a broad and balanced interpretation of greatest permanent value -- and we believe the majority of Oregonians support such a view as well. Neither statutory language nor administrative rules make one interest or goal dominant in the management of these state forests. Rather, administrative rules make clear that state forest management should balance many values including but also beyond timber harvest, such as recreation; water quality; and the protection and enhancement of habitat for native wildlife, salmonids, and other native fish. All such actions, too, must be guided by the best available science.

A broad view of greatest permanent value is also merited by the geographic location of the bulk of state forests. Northwest Oregon has few federal lands and large population centers, so the state forests provide key sources of publicly owned habitat and recreation not otherwise available. In addition, past and ongoing private land forest management cannot be said to balance timber production with fish and wildlife habitat production. Measure 37 and growing development pressure on private lands surrounding state forests underscore the importance of maintaining an intact and productive forest ecosystem on state forests.

Managing state forest lands on a private land timber production model, as encouraged by some, would undercut the role of state lands in providing habitat types across the greater Northwest Oregon landscape that are relatively lacking on other lands.

Second, we urge caution in placing too much emphasis on any single indicator. We are particularly concerned about the emphasis by some on net return on asset value (ROAV). ROAV as calculated for the state forest performance measure places an almost exclusive emphasis on timber-centered values. There is no accounting for values such as recreation, fish, or wildlife in the ROAV measure, nor the value of ecosystem processes such as clean water. Thus ROAV falls far short of capturing the wide range of values recognized as components of greatest permanent value.

Some of the values missed by ROAV may be captured by performance measure #2(d) regarding the value of recreation, but no data is yet available on that measure. Hopefully some light will be cast on broader values as a result of the work between ODF and Oregon State University on the economic value of carbon sequestration, recreation, and non-consumptive use of state forests. But we still hold that a broader study of the various economic values that flow from state lands is needed.

Third, we wish to reiterate our view regarding the value of stand structure as an indicator of wildlife habitat. The validity of stand structure as an indicator of the protected and enhanced habitat called for by administrative rule is highly uncertain. The peer review of the Harvest and Habitat (H&H) model, for example, indicated "a low level of confidence in the model's use of forest structure as an indicator of wildlife habitat, and therefore a low level of confidence for assessing the wildlife implications of different management alternatives." The peer-review team recommended several steps that would enhance the validity of a stand-structure indicator to assess wildlife habitat, and we encourage the Department to move forward expeditiously on those recommended steps. In any case, we hope that the Board and Department will look beyond the specific performance measures adopted to date in order to carefully evaluate the scientific basis of any modifications to the FMP. Recent work by the CLAMS project on landscape-wide projections could prove especially useful in assessing FMP changes in a landscape context.

While the modeling of stand structure as an indicator for habitat needs improvement, one finding is made clear by the data presented today: the state forests are a long way from meeting their goals for complex forest habitat. Less than 1% percent of the forest is older forest structure and less than 2% is layered stands: the target of the implementation plans is 50% of the forest in these two types. From our view, then, the appropriate task at hand is to rebuild the native ecosystems on these state forests by heightening the prominence and urgency of restorative measures rather than to further draw down an ecosystem so depleted by human-caused fire and timber harvest.

To summarize and clarify our requests:

Any changes to the FMP should enhance habitat for species of concern through permanent and biologically-driven strategies;

The best available science should be brought to bear on any proposed changes, including the refinement of Department models (H&H), the use of partner agencies (ODFW), and related initiatives (CLAMS);

Broader assessments and calculations of economic value (beyond timber production) should be conducted to provide a more robust assessment of the values provided by state forests.

We sincerely and respectfully offer our appreciation for your public service, and we look forward to continuing to work with the Board and Department on the management of these lands that we all cherish.

Audubon Society of Portland, Cheryl Coon
Center for Biological Diversity, Noah Greenwald
Coast Range Association, Chuck Willer
CRAG Law Center, Chris Winter
Native Fish Society, Bill Bakke
Oregon Council Trout Unlimited, Tom Wolf
Oregon Wild, Steve Pedery
Pacific Rivers Council, Mary Scurlock
Sierra Club, Oregon Chapter, Donald Fontenot
Umpqua Watersheds, Francis Eatherington
Wild Salmon Center, Bob Van Dyk