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Adapting Forest Management Plans

Comments by Rex Storm, Certified Forester
Forest Policy Manager, Associated Oregon Loggers, Inc.
before the Oregon Board of Forestry
June 6, 2007

Chair Hobbs and Board members, my name is Rex Storm, Forest Policy Manager for Associated Oregon Loggers (AOL). I make these comments on behalf of more than 1,000 member companies of AOL, representing logging and allied forest management businesses working across Oregon. Since 1995, I have been engaged in development and implementation of the NW/SW Oregon State Forest Management Plans (FMP). Although I'm currently a member of the State Forest Advisory Committee, today I'm here speaking on behalf of only AOL.

Thank you for the opportunity to share our concern and interest in management of state forests—in particular the FMP, adopted January 3, 2001. I strongly urge the Board to amend the FMP for the purpose of improving the greatest permanent value to Oregonians (GPV). I testified before the Board last year on two occasions in support of FMP amendment, April 28 and June 7, 2006. Today, I encourage you to consider way that the FMP could be improved by its amendment.

We base our recommendation on several factors, including:

1. State Forest Performance Measure Results (dated 6/6/07) reveal very low attainment in several areas, which indicates that the GPV is not being accomplished under the current FMP.
2. The 2006 Harvest & Habitat Project (H&H) revealed that FMP strategies would not achieve the annual harvest volume promised when the plan was adopted in 2001. Further Board discussions went nowhere about whether the FMP could allow departure from the even-flow of harvest.
3. The failure after over ten years to complete the proposed Habitat Conservation Plan (HCP)—begun prior to the 2001 FPM adoption. Policy developments in the past decade, combined with this HCP failure, would suggest that alternative take avoidance strategies are warranted for management of state forests.
4. Three significant species developments in the last two years warrant alternative strategies for state forests: n. spotted owl recovery planning; murrelet status review; and coho delisting.
5. Last winter's storm events raised concerns about whether FMP strategies are vulnerable to even larger catastrophic events, and whether the FMP would facilitate a timely management response that would nourish the GPV.
6. The current FMP no longer has support of the important stakeholders necessary to make it succeed (Forest trust land counties, state timber purchasers and forest operators—to name a few).

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Regarding the 2006 Results Summary of State Forest Performance Measures—which the Board is today reviewing—it is apparent that the current FMP is under-performing in several areas that warrant FMP amendment. These areas of needed improvement include:

#1—Net Return on Asset Value (ROAV) of 1.2% to 2.4% is markedly below the 4-5% expectation previously discussed by the Board

#1—ROAV – Future trend of the current FMP would suggest that ROAV will decline further, as forest volume (asset value) climbs in pursuit of greater percentage of complex stands

#1—ROAV – H&H model exercise suggests that stand (and per acre) yields are significantly reduced to achieve high structure complexity (50%)—thereby reducing harvest volumes and predicted returns for ROAV

#1—ROAV – Abject failure of the current owl take avoidance strategy, other species strategies, complex stand percentage goals, and HCP attempts, would suggest that the current FMP cannot even sustain current harvest volumes

#2 & 3—Financial Contributions to Communities (and Governments) – Under-performance of harvest volume directly translates into stifled economic activities in Oregon's forest communities.

#4—Invasives, pests, disease, fire – The impacts of windfall and storm damage need to be included in affects of value losses—due to decay, wasted timber, and reduced stand growth & yield.

#6—Structure – The FMP attempt to achieve a high percentage of complex structure (50% of acreage) is unrealistic, and very costly in terms of foregone opportunity for forest growth & yield. The Performance Measure Results indicate that the Closed Single Canopy and Understory structures continue to far exceed the targets. The FMP's slow progress toward reducing CSC and UDS is drastically reducing future harvest and revenue yields from these state forests.

#7—Recreation -- Under-performance of harvest volume directly translates into stifled revenues available to help support growing recreational demands upon state forests.

We urge the Board to act on the new developments that warrant amending the FMP, for the purpose of improving the greatest permanent value to Oregonians (GPV). Please consider the *urgent* importance of state forest timber harvest volume to Oregon's forest economy, our rural community fabric, and keeping state forest management sustainable.

Thank you for this opportunity to comment. We anticipate continuing a productive working relationship with the Board and Department.