



July 25, 2008

Members Oregon Board of Forestry  
Oregon Department of Forestry  
2600 State Street  
Salem, OR 97310

Dear Board Members,

We are writing to express concerns about the current ODF process to evaluate alternative strategies for species of concern in the Clatsop and Tillamook State Forests. While we appreciate the ODF's willingness to meet with us about this process, the information we have learned give us little reason for confidence in this planning effort. In particular, we have concerns about the lack of sufficient scientific expertise in the process, including a lack of peer review; the omission of dozens of species from the list of species of concern; and the lack of specific criteria or methods for evaluating how alternatives would affect the survival and recovery of species of concern. Without such basic components, we think the process will not meet the OAR requirement that plans "be based on the best science available."

In working to develop management for species of concern, ODF has initiated several processes that as of yet, have not come to fruition. ODF worked for years with the U.S. Fish and Wildlife Service to develop a habitat conservation plan (HCP), but never adopted any plan. More recently, ODF began developing strategies for species of concern culminating in a draft issue paper dated June 5, 2007, which was kindly provided to us by ODF.<sup>1</sup> Similar to the HCP, the alternative management strategies detailed in the draft issue paper were never adopted. Now ODF is revisiting the species of concern strategies based on direction from the Board to consider increasing the amount of revenue produced from state lands while aspiring to less complex forest structure than would be produced under the current plan.

At this time, we do not know what these new strategies will entail. Despite this limitation, we are writing to express concerns with the strategies proposed in the draft issue paper under the assumption that the new strategies are being developed under a similar framework.

Our first concern is one of process. There appears to be insufficient scientific input to the species of concern strategy. Few of the ODF employees involved are biologists or

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<sup>1</sup> Oregon Department of Forestry Alternatives for Species of Concern Strategies Issue Paper, June 5, 2007 – Draft. Provided by Ron Zilli March 12, 2008.

taxa experts by training. While we are glad to see one consulting Oregon Department of Fish and Wildlife biologist, this is not sufficient scientific expertise given the broad range of species of concern on state lands and the complexity of these varied species' biological needs. By comparison, literally hundreds of scientific experts were involved in developing and evaluating the Northwest Forest Plan. We recommend that ODF immediately engage scientists with expertise in the various species of concern to peer review the methodology for developing and assessing the alternatives for protecting species of concern.

Related to the lack of scientific expertise and peer review, the draft issue paper does not present or discuss the methodology for how the various alternatives for protecting species of concern were developed or how they will be evaluated. Moreover, scientific references or discussion of the habitat needs of the various species of concern are completely absent from the Issue Paper. Again by comparison, the Northwest Forest Plan utilized a detailed methodology for evaluating the effectiveness of alternatives towards ensuring that nearly one thousand species would have viable populations and be well distributed across federal lands. We recommend that a similar methodology be utilized to evaluate the alternatives being developed by ODF.

On a more substantive note, the number of species of concern identified in the draft issues paper is far below the number of species that are potentially at risk because of forest management on state lands. Based on a list of 70 species in the Forest Management Plan, which included "listed fish and wildlife species and species of concern on or near state lands," the draft issue paper widened this number down to 17 species, including "species that are uncommon in the plan area and for which nest site protection is needed," "species that use a special habitat either rare or uncommon on some state forest lands," and "species that have unknown distribution on state forest lands but are strongly associated with mature forest habitats and are known or suspected to be highly sensitive to forest management." We are aware that this list has been broadened to include some aquatic species, which is an improvement ([http://www.oregon.gov/ODF/BOARD/docs/July\\_2008/6 Att 2.pdf](http://www.oregon.gov/ODF/BOARD/docs/July_2008/6_Att_2.pdf)).

Although ODF has identified valid criteria for identifying species of concern, the list, even including the additional aquatic species, is far too short. ODF appears to have only considered vertebrates and excluded plants and invertebrates, resulting in exclusion of hundreds of species. For example, we identified a total of 215 species of concern in the five counties containing the majority of state forest lands, including Clatsop, Tillamook, Columbia, Washington and Yamhill Counties.<sup>2</sup> A portion of these species occur outside of forest habitats, such as in coastal or marine areas, but the majority are found in forest lands and potentially impacted by state forest management.

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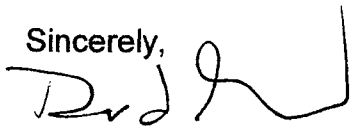
<sup>2</sup> Species of Concern of the Tillamook Rainforest and North Coast, Oregon, a Center for Biological Diversity Report by Noah Greenwald and Amanda Garty, June 2007. Available at: <http://www.biologicaldiversity.org/publications/papers/TillamookReport.pdf>

ODF should at least evaluate these species and determine if they are potentially at risk because of state forest management.

Finally, the alternatives outlined in the draft issues paper are unlikely to ensure the survival and recovery of numerous species of concern that depend on state lands, particularly those dependent on mature and older forests because the alternatives in most cases specify very little protection for species of concern in terms of the number of acres that are protected, do not specify permanent reserves that allow for the development of old forest characteristics, which takes hundreds of years, or ensure that old forest habitats will be connected across the landscape. These are the key components of a landscape strategy to preserve biologic diversity and will need to be incorporated into any revision of forest management plans if the state is going to preserve Oregon's natural heritage on state lands.

In sum, we recommend immediate peer review by multiple scientific experts of the methods that are being used to develop strategies for protection of species of concern, peer review of any product that is ultimately produced, an expansion of the list of species of concern to include plants, invertebrates and aquatic species, and ultimately a landscape plan that includes interconnected and permanent reserves.

Sincerely,



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