

From: Wild Salmon Center (Bob Van Dyk), Center for Biological Diversity (Noah Greenwald), Association of Northwest Steelheaders (Ian Fergusson), Sierra Club (Ivan Maluski), Audubon Society of Portland (Meryl Redisch), Pacific Rivers Council (Mary Scurlock), Cascadia Wildlands (Josh Laughlin), Tualatin Riverkeepers (Brian Wegener)

To: State Forester Decker

Re: 2011 Implementation Plans for the Astoria and Forest Grove Districts

Date: May 25, 2011

Thank you for the opportunity to comment on the 2011 Implementation Plans for the Forest Grove and Astoria Districts of the Tillamook and Clatsop State Forests. We offer these comments collectively to underscore our common concerns about the 2011 Implementation Plans. Some of our organizations may provide comments separately as well.

Request

We urge you to decline approval for the 2011 Implementation Plans (IPs). The IPs devote too much of the forest to management that is strongly characteristic of industrial tree farms, and consequently the plans provide too little consideration for fish and wildlife, water quality, recreation benefits, carbon sequestration, and standing timber for future generations.

The actions promised by the plans, and the work behind the plans' development, do not meet the legal mandates for science and restoration.

Moreover, ODF anticipates (Attachment A) severe budget shortfalls in less than four years, despite the projected harvest increases. These shortfalls occur despite the huge cuts (2009 budget of \$29.3 million to 2010 budget of \$19.9 million) that the state forest program has already suffered. When such an aggressive harvest plan still cannot sustain an increasingly spare ODF program, a new way is required.

We recommend that you keep the current plans in place while you engage a wide range of stakeholder groups and other agencies to develop plans that:

- 1) Are based on the best available science, and;
- 2) Provide a more robust strategy for sustaining non-timber values, including ODF itself.

The Board of Forestry and the Governor will need to provide leadership and support for you to find the fiscal, ecological, and social sustainability required by the greatest permanent value mandate. We will ask them for such leadership.

Summary of Concerns

Our concerns are complex and interrelated. We attempt to summarize them under three broad headings below.

1) **The plans are not based on the best available science.**

We support the use of the best science available in managing state forest lands, as required by OAR 629-035-0020(1), (3)(e). Unfortunately, the best available science was not used in preparing the draft 2011 Implementation Plans currently subject to public comment.

Pursuant to OAR 629-035-0020(2)(a), the State Forester shall ensure that management of state forests “results in a high probability of maintaining and restoring properly functioning aquatic habitats for salmonids, and other native fish and aquatic life.” The Board of Forestry chose to move away from the Draft Western Oregon Habitat Conservation Plan (HCP) and replaced it with a Species of Concern policy (“SOC”), which is reflected in the proposed implementation plans for the Forest Grove and Astoria Districts.

A recent analysis by the Institute for Natural Resources (INR) assessed ODF’s analysis of the SOC strategy to determine whether ODF’s analysis was consistent with the best available science.¹ The INR report found that the Board of Forestry relied upon outdated assumptions and ignored readily available science when deciding to follow the SOC strategy, which is incorporated in the proposed IPs.

We know that the Department and Board are aware of the important conclusions of the INR report and are currently determining how and whether to respond to and address these issues. In the meantime, the only rational, defensible course for the Department is to refrain from approval of the proposed implementation plans. To move forward would effectively ignore INR’s conclusions that the Board’s information on the SOC strategy does not rely upon the best available science in protecting habitat for native species.

Without repeating the extensive findings of the INR report, we summarize some of the more important conclusions. First, the INR report concludes that ODF has yet to set forth any conclusions about the impact of the SOC strategy to the affected species, which clearly conflicts with the best available science. Instead, ODF discusses impacts to biophysical conditions (e.g. on the amount of older forests) instead of discussing the effect of these impacts on the species themselves. By focusing solely on changes in narrow biophysical conditions, ODF fails to identify impacts to the actual species, despite the fact that modern landscape ecology provides the necessary tools to do so. As the INR report states, ODF’s assessment “does not answer the

¹ Institute for Natural Resource, *Final Report – Science Review of the Oregon Department of Forestry’s Proposed Species of Concern Strategy and the Board of Forestry’s Stae Forests Performance Measures* (February 28, 2011).

underlying question of interest: what will be the effect of changed management practices on the SOC?”²

The INR report found that none of the metrics for analyzing species of concern were based on the current science, while only part of one performance measure met that standard (out of nine performance measures). For instance, the INR Report looks at the limiting factors used by ODF to assess impacts to Species of Concern. Importantly, the INR Report notes that none of the limiting factors account for the “threshold of large wood needed for salmon recovery targets,” and similarly that the limiting factors do not provide a “threshold of young forest retarding salmon recovery targets.”³ ODF’s SOC policy, therefore, does not reflect the best available science related to restoring properly functioning aquatic habitat for salmonids as required by OAR 629-035-0020(2)(a), (3)(e). The best available science dictates that large wood, in particular, is critical to salmon recovery, however, the SOC policy and ODF’s analysis contain no targets or thresholds for large wood recruitment over time for recovery of habitat.

In addition, the Department of Forestry failed to analyze or account for climate change, either in terms of how management affects carbon stocks or of how climate change will affect the forest. To achieve the Greatest Permanent Value, the State Forester must ensure that our healthy and sustainable forest ecosystems provide for clean air as well as habitat for native wildlife and protection against floods and erosion. OAR 629-035-0020. To date, there has been no consideration of the role that the State Forests must play in protecting our air quality, providing refuge for species impacted by climate change, and serving as carbon sinks to mitigate the impacts of climate change.

Beyond the INR report, concerns by a staff biologist and errors in spatial projections undermine our confidence in the plans’ anticipated levels of timber growth and yield. A recent memo (Attachment B) from ODF biologist (and trained forester) Clint Smith provides detailed reasons to think unwarranted optimism has skewed harvest projections. (Note: Smith also raises serious concerns about adaptive management that we echo below.) Smith notes potential errors in growth and yield tables, as well as potentially unwise predictions about the ability to undertake costly silvicultural treatments. Biased assumptions have produced over-optimistic harvest estimates many times before, most recently in association with the 2001 FMP. The Board has a public duty to ensure that we do not make this mistake again.

Unfortunately, the science behind the growth and yield modeling was not considered by the INR. ODF’s growth and yield modeling needs third party review, a reasonable quality control measure which we believe should not be difficult to obtain.

The Department’s spatial projections of harvest also show reasons for concern. For example, ODF’s spatial models illustrate widespread clear cutting in some areas designated as Terrestrial Anchors (Attachment C). Yet the IPs say that in Terrestrial Anchors, “Harvest will likely be

² INR Report at 9.

³ INR Report at 14-15.

limited to thinning projects with the possibility of some small retention cuts.” (Astoria IP at 14). The modeled clear-cut harvest in these areas suggest error, and provide another reason to undergo independent review of harvest modeling before any IP can be approved.

Together, the INR report, concerns from your staff, and possible errors in harvest modeling support our conclusion: The record clearly shows that the best available science standard has not been met.

2) Approval would have unacceptable impacts on non-timber forest values.

ODF must manage these state lands in a manner that provides far more than timber harvests. ODF must see to it that any plan “[r]esults in a high probability of maintaining and restoring properly functioning aquatic habitats for salmonids, and other native fish and aquatic life...protects, maintains and enhances native wildlife habitat...protects soil, air and water, and provide outdoor recreation opportunities.” OAR 629-0350-0020(2). The record shows a high likelihood that the 2011 Implementation Plans will have significant negative effects on the values you must provide, and also on many special places in the state forests, such as streams important to salmon, forest stands important to species of concern, trails important for recreation, and lands with unique geographic attributes.

Specifically, continued and increasing levels of clear cuts, partial cuts, and new roads will diminish many other forest values, including aquatic and terrestrial habitat. Regarding terrestrial habitat, extensive clear cut harvests are anticipated in layered stands, which are comparatively rare on the north coast landscape. The 20-year target for complex forest in the Astoria District is actually well below the current level of complex forest in the district.

Regarding roads, the proposed implementation plan for the Forest Grove District predicts the construction of an additional 114-154 miles of new roads over the life of the implementation plan, while the Astoria District adds between 150 and 200 miles of roads. ODF has not and cannot demonstrate how the construction of 264-350 miles of new roads in the two districts “[r]esults in a high probability of maintaining and restoring properly functioning aquatic habitat” and “protects soil, air, and water.” OAR 629-035-0020(2)(a), (c). To the contrary, enormous thinning projects and the related expansion of the road networks are likely to generate numerous negative effects -- through increased sedimentation, landslides, and motorized vehicle use across the landscape. Introduction of invasive species may also worsen with more roads. The cumulative effects of such activities are likely to be inconsistent with protection of salmon and water quality. More roads also commit the state to higher maintenance costs for decades to come.

We are also concerned about the performance measure for roads. ODF assesses the impacts of the road network primarily through its target of less than 15% of hydrologically connected roads. There are two problems with this metric: 1) 15% hydrologic connectivity allows too much hydrologic alteration and direct drainage of road runoff to streams. Through road drainage re-design and decommissioning, it is practicable to achieve much lower connectivity, on the order of 2-10%; 2) It ignores the total density of roads within a watershed, which has been shown by the best available science to be closely correlated to habitat quality and fish populations. See e.g. Trombulak S.C. and C.A. Frissell. 2000 (citing Baxter, C.V., C.A. Frissell, and F.R. Hauer.

1999. Geomorphology: logging roads and the distribution of bull trout (*Salvenius confluentus*) spawning in a forested river basin: implications for management and conservation. Transactions of the American Fisheries Society. 128:1077- 1083; and Rieman, B.E., D.C. Lee and R.F. Thurow. 1997. Distribution, status, and likely future trends of bull trout with the Columbia Rivers and Klamath River Basins, North American Journal of Fisheries Management 17: 1111-1125). To truly protect, maintain, and enhance the soil and water resources, and aquatic habitats of Oregon's forests, a performance measure aimed at reducing road density in these forests is necessary.

ODF's 40-year modeling also projects extensive clear-cutting and road construction in special recreational and geographic locations under the harvest rates in the 2011 plans. For example, adjacent to Kings Mountain lies Ben Smith Creek Salmon Anchor Habitat, which will see extremely high levels of clear cutting over 40 years in order to sustain the IP harvest level (Attachment D). New roads and other clear cuts also will reach many slopes on Kings, including the trailhead (Attachment E). The model also shows clear cut harvests blanketing unique geographic locations, such as state forest lands fronting the Columbia River (Attachment F), and in the steep canyon of Scoggins Creek, which is upstream of Hagg Lake in Washington County. Such harvests will diminish the public's use and enjoyment these areas, as well as the ability of these special places to provide a broad range of other public benefits. It is unwise to approve a ten-year implementation plan that will require these harvests to sustain timber volume over time.

3) The uncertainties are too great to be addressed through adaptive management.

The 2011 Implementation Plans leave too little room for adaptive management, because they place their substantial ecological risks squarely on the resource. While the long-range plan for the north coast state forests provides for a goal of 50% to 30% of older and complex forest, the 2011 Implementation Plans propose management with a goal at the lower limit -- only 30% complex forest. This lower goal for complex forest, and related higher levels of harvest, mean that there is far less room for error and adaptation in attaining the requirement to maintain, enhance, and restore habitat (See Attachment A). For example, many stands designated to become complex were decimated by the 2007 windstorm on the north coast -- and then clear cut by ODF. If one operates with a smaller pool of complex forest, then such losses are proportionately larger to rare habitats.

Our concern is compounded by findings of the INR report, which noted that ecological stressors, such as climate change and invasive species, raised the possibility that tipping points could be reached for some species under the strategy embodied in the 2011 Implementation Plan. Indeed, the INR report found that "There is a high probability that it [a tipping point] could occur in one or more species (p. 23)." Operating at the lowest goal for complex forest removes room for error, yet error is inevitable.

Promises of adaptive management simply cannot compensate for a high-risk management approach such as the one being considered. Science tells us that many outcomes of forest management activities -- particularly watershed and stream responses -- cannot be adequately managed through response-based adaptive management. Critical responses such as water quality, stream stability, and instream or riparian habitat can unfold from complex causal chains accruing over many years or decades after initial action. Once these responses set in (e.g. stream

sedimentation and channel incision), they may take more years or decades, even centuries, to reverse. That is why many key actions affecting watershed and stream response should be designed to avoid risk to these resources at the front end by using only management approaches we have a sound scientific basis to believe are adequate. *See e.g.* (Montgomery 1995) (advocating regulation according to “input” criteria rather than “output” response criteria as envisioned by adaptive management frameworks).

Perhaps most importantly, ODF has nearly eliminated its monitoring program. At the same moment the Board of Forestry has decided to take greater risks, you have suffered a great reduction in your ability to measure the impacts of what you are doing.

Closing

We recognize that Department of Forestry staff has worked extraordinarily hard to produce these Implementation Plans on short deadlines. Nonetheless, we urge you not to approve the 2011 Implementation Plans because they are not in the best interest of Oregon. The combination of many facts – the neglect of the best available science; incredible ambitions for monitoring and adaptation; the lengthy extension of an unsustainable road network; and a looming crisis in ODF funding (even at the higher harvest levels) -- all point to the need for a different approach to such a valuable public asset.

The budget shortfall in particular – which occurs even with your reduced ODF staff – points to the need for systemic change in the administration of these lands. A new way of doing business on state forests is needed, and the effort should be built on extensive and integrated partnerships between ODF, ODFW, Parks, INR, and OSU. There are no longer resources for the duplicative separation of state agencies. Moreover, the bureaucratic and political isolation of ODF has produced lop-sided, unscientific, overly optimistic, and very expensive plans that still can't sustain the agency. This must change.

The mandate for management of these lands – “so as to secure the greatest permanent value of such lands to the state” –cannot be fulfilled by increasingly limited ODF staff. Sophisticated and experienced public servants from other state agencies can complement the talent of ODF staff to far better provide us with the science-based and sustainable forest management we require.

Many of our groups would be very pleased to work with you, your staff, and the Board of Forestry to craft plans that have a stronger anchor in the best science and that ensure a more robust and reliable provision of the full range of values that these public forests offer. We are further interested in supporting efforts to diversify, stabilize, and increase revenue to the agency and from the forests.

Thank you for the opportunity to comment on these important plans. We appreciate the hard work and professionalism of you and your staff. Please contact the people listed at the top of these comments if you have questions or if we can provide more information.