

Comments: Alternate Forest Management Plan

February 17, 2015

From: Ian Fergusson, Northwest Steelheaders/North Coast State Forest Coalition

Chair Imeson, State Forester Decker, and Subcommittee Members;

Thank you for the opportunity to comment.

We understand the new FMP is on a fast track; however, we do not think the plan is at a point where it can be moved to the full Board. Specifically, as stakeholders we would like the opportunity to meet with the Department and go over the plan in detail so that we can get more clarity around some issues.

I have some specifics to point out today.

Old Growth

Old growth forests are the rarest habitat type on the North Coast. The proposed plan defines old growth as trees greater than 175-250 years, and calls for protecting those trees and stands. While there may be some ecological benefit in identifying that age class as truly characteristic of old growth, very few trees would be protected. If we are to begin to build and recover true old growth on the North Coast, we simply need to stop cutting the oldest stands on the North Coast. We think an appropriate age cutoff is more in the range of 100 years. The conservation zone should be mapped to include all of those stands, unless they are truly isolated and providing little or no ecological benefit. Under no circumstances should these stands be pre-emptively cut to eliminate older forest habitat and avoid recovery of rare plants and animals.

Allocation Percentages

The external science review called for a minimum allocation of 30% for the conservation zone. The proposed plan appears to view 30% as a cap. Furthermore, the proposed plan appears to anticipate continuing structure based management activities within the conservation zone. If so, we oppose that. We continue to believe that a third zone is essential for managing and responding to unpredictable risks. This intermediate zone would be managed for some production and some conservation, and could serve as a risk buffer when catastrophic events affect either the production or conservation zone. An appropriate allocation of zones might be 30% conservation, 30% production, and 40% mixed. We would like to see the modeling of such an approach.

Model Assumptions

We are glad to see that the proposed stream buffers echo the science team's recommendation for simplicity. We need to have some discussion with the Department around the buffers and how much of a conservation pickup they represent, and whether additional rules might apply that are not specified. We hope the proposed buffers are exactly as worded in the model assumptions.

During the stakeholder group process, we asked the science team to evaluate Washington DNR state forest stream buffers. The Science Team ignored our request. We have also asked the Department to model those buffers. We are puzzled to see that is still not being done. We think those buffers could be particularly informative inasmuch as they are part of an approved HCP, and it seems prudent to at least model the impact.

We are concerned about the use of the FPA in modeling. One of the purposes is to provide an "endpoint", showing maximum production output. If the FPA production approach is to be modeled, we think this provides yet another reason to model the DNR state forest approach.

Another issue with modeling the FPA is the unrealistic expectations that it might set. We do not believe that the FPA as currently practiced on private lands would be legal if applied to State Forests. The GPV rule calls for the restoration of properly functioning aquatic ecosystems, and the Board has already found that the current FPA buffers violate the PCW criterion. Federal agencies and the Science Team also noted evidence that the FPA buffers do not protect riparian systems. The science review found numerous areas where applying FPA standards would result in conservation negatives.

We have questions around the High Landslide Hazard Locations and their contribution to a conservation benefit. For example, if the hazard assessment applied to all steep slopes, not just those threatening humans, then this would be viewed as a conservation benefit in terms of protecting water quality. However, if the HLHL's apply only where there is risk to human life, then it would not be a conservation increase, as these areas are already off limits.

In summary, our Coalition was surprised by this document and by the request that the Board approve it today. We have had no communication with department staff over plan details in 2015. Our last meeting with them was in December. Since that time, the Department has decided to devote 70% of the landscape to industrial-type rotations. They have apparently decided that some version of structure-based management will still be applied to some conservation areas. They have refused to commit to maps of conservation areas in the FMP. They have decided not to include explicit assumptions about an HCP in the planning process. They have made all these decisions without providing any initial modeling that describes places to be

conserved, areas to be harvested, or anticipated timber or conservation outcomes. All this was provided with just a single day to review the materials before the start of a three-day weekend.

We encourage you to table the proposal before you today to give time for us to digest the proposal, consult with our colleagues and with ODF about their proposal, view initial maps and modeling results, and thus be in a place to speak confidently about the direction ODF has proposed.

Thank you for your consideration.