



State Forests –Alternative Forest Plan

Comments by Rex Storm, Certified Forester
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before the Oregon Board of Forestry -- Subcommittee on Alternative State Forest Plan
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Board Subcommittee members and State Forester Decker, my name is Rex Storm, Forest Policy Manager for Associated Oregon Loggers (AOL). I make these comments on behalf of the 1,000+ member companies of AOL, representing logging, transportation, construction and allied forest management businesses working across Oregon. AOL member companies provide services to manage public and private forests on a contract basis, including Northwest Oregon's state forests. Your consideration of a new State Forest Plan is of critical concern to our work.

We have three observations for you to ponder regarding the current Draft “*Analysis of Financial Viability and Conservation Measures...*” document (19-page Financial and Conservation Analysis, for today's meeting 2/17/15).

1. Financial viability definition (page 2-3). As written, financial viability is defined in a singular fashion, “sustaining the FDF balance” and the “ODF state forest program.”
 - ✓ I challenge you to at a broader scope of the financial viability definition.
 - ✓ While the state forest program and FDF is an important barometer for measuring the situation, there are additional significant financial metrics worthy of explicit inclusion in your financial viability definition. These additional important metrics are state forest contributions to: a) county & local taxing district revenue; b) rural school enrollment; and c) forest sector production/timber volume.
 - ✓ It is through your partnership with these added stakeholder metrics that state forest financial viability is best measured.
2. Conservation emphasis definition (page 5, especially the IUCN definition). As written, conservation emphasis is defined without the important “time” dimension. As time is an essential function of forestry, my recommendation is that the conservation definition should include the long-term time dimension. Because of the critical balance-of-harm decisions so common in forest management, “conservation” cannot be characterized without the long-term perspective. Forest resource management is a long-term endeavor. We urge your conservation definition to include the language, “over the long-term.” Resource managers must have the professional discretion to make decisions causing small short-term impacts, in order to accomplish larger long-term benefits. This is a balancing-of-harms exercise that is fundamental to forest sustainability.

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3. Conservation measures of success. (page 7-8). As written, two of the six bullets present very problematic language.
 - ✓ Bullet #2 would mandate “restoring” wildlife species. This language implies, or could be construed as, “recovery.” This type of language is fraught with an explicit instruction that would potentially be crippling to the state forest plan. No single non-federal landowner has the legal nexus to “recover” a species. Rather, it is the legal responsibility of each non-federal landowner to contribute to providing and maintaining habitat.
 - ✓ Bullet #6 would mandate just two of the four Oregon water quality criterion for forests. This language also wrongly discriminates against the Oregon legal designated use of forest streams: that being “fish use.” The stated mandate parses the Oregon water quality standard; it excludes two of the four criterion established in the early-2000s; and it fails to acknowledge the primary legally-designated fish use.

In summary, as we work together to define both “conservation” and “production” metrics, I urge your thoughtful examination of the words. Those words that would measure and define success of the new forest plan do have so much meaning for our future state forest management.

Thank you for the opportunity to comment. We look forward to cooperating with the Department staff and Board to help craft a new & improved state forest plan, which optimizes outcomes for timber revenue and conservation values.