

The following is Trygve Steen's response to a Dan Goody Letter of June 24, 2015 - - which was written in response to a report on the proposed Homesteader Timber Sale, which I co-authored with Chris Smith, State Forest Conservation Program Coordinator, Oregon Chapter, Sierra Club.

1. Logging of old-growth and advanced mid-seral forests:

A2 is of special significance here, as are areas A3, A4, and A5 (as denoted in the table portion of the March 2015 Homesteader Pre-OP report). These areas in the proposed Homesteader Timber Sale contain forest that includes significant old-growth characteristics as listed in the definition included in your letter. The large, old trees in these areas are of special significance, since such trees are extremely rare in north coast state forests. Because of their unusually great age, they represent especially significant genetic diversity (a biodiversity resource that critically needs to be protected). These old trees can most appropriately be protected by not logging in these areas identified for the Homesteader sale. Attempting to leave individual trees or even small groups of trees while doing any significant logging in these areas (especially A2, as well as A3, A4, and A5) risks the loss of the invaluable resources these trees represent - - their genetic diversity value as well as their special habitat values.

It is also essential to recognize that individual trees are part of a forest ecosystem, in which the *collective* impact of the forest trees on local climate is substantial - - this includes a forest's action to protect individual trees from wind as well as maintain microclimate conditions with respect to rainfall, humidity, and light. Wind is of special concern here,

because opening up a stand invites blow-down of or damage to any of the individual trees which you are trying to “save” or “protect”. Protection of the old trees in these areas requires not logging in these units. **Micro-managing logging to “protect” the old trees we have identified is simply not appropriate.**

In relation to defining old-growth, coast range forests develop especially quickly, given their rapid tree growth. Sale areas A2, A3, A4, and A5 need recognition for their ecological values and their advanced stage in fully developing old-growth characteristics (conferred by their especially large, old trees). Your age and seral stage characterization of these areas inappropriately devalues them. The 114 year age you cite for A2 is not an appropriate age value, given the numbers of trees that I have found to be significantly older. Furthermore, lumping these stands (especially A2) with the large areas of post Tillamook burn stands, where the oldest trees are only 60 to 79 years old, is a serious error. **Now is the time to recognize the ecological value of these areas of forest and seize the opportunity to remove these entire areas of your proposed Homesteader Sale from your plans for logging.**

2. Older forest habitat for wildlife:

Thank you for providing survey information you have available for both the Marbled Murrelet and Northern Spotted Owl. Their absence in these areas is not a reason to log the Homesteader sale. In fact, **your observations indicating the absence of both Marbled Murrelet detections and**

the Northern Spotted Owl provide strong reasons for not logging these areas. The areas that would be logged in the Homesteader sale are unusually valuable opportunities to provide future habitat for these species, because these areas are especially close to being able to provide such habitat. Remember that intact old forest habitat is essential for the recovery of these species populations. Note, shelterwood logged areas on BLM lands in the coast range provide poor Murrelet habitat, because nest sites are exposed and commonly are not successful because of predation. Where can you find equal or better candidates for future intact forest habitat for these species?

In this context, I am concerned that ODF staff has gone on record cautioning that management of state forest lands should avoid providing habitat for T&E species by growing older trees, because that will complicate future management. (February 17, 2015 FTLAC meeting provides one example). If the ODF is serious about meeting the Greatest Permanent Value clause, this mindset needs to be changed. While providing family-wage jobs and funds for local taxing districts is an important role of our state forests, so too is providing ecologically significant forest habitat. The Homesteader sale areas may not be currently occupied by Marbled Murrelets-- that is why the Homesteader Report I was involved in writing notes "future potential habitat", - - but they have the potential to provide that critically needed habitat in the near future. They will also do so much more quickly than most of the Tillamook and Clatsop State Forest lands.

While indicator and umbrella species such as the Marbled Murrelet and Northern Spotted Owl need to be significant in our management decisions, it is also important to recognize

the need to protect intact older forest habitat for its diversity of above ground species as well as fundamental soil resource biodiversity. The areas you are planning for in the Homesteader sale are significant in these additional ways, because by not logging in these older forests you will be protecting biodiversity components that we still do not have the scientific knowledge to precisely identify. The Precautionary Principle is very relevant here.

3. Real estate and aesthetic values:

These values can also be best protected by not logging Homesteader Sale units, especially A2. These considerations are appropriate to add to the reasons for not logging in A2. **Leaving some “older large trees to mitigate visual and aesthetic impacts and provide for wildlife habitat” is not an adequate solution.** Scattered leave trees are no substitute for a forested slope as is visible in A2. Furthermore, scattered leave trees are simply candidates for blowdown and becoming broken trees, given the severe wind conditions that often occur the the proposed Homesteader Sale area. It is also important to recognize the limited value of scattered trees for wildlife habitat. Intact forest is what provides wildlife habitat and a quality aesthetic experience, not a few lonely trees left in an area that has been logged.

4. Adding Homesteader area to the Buster Terrestrial Anchor:

Thank you for your general statement of your management

parameters for the Astoria District and Oregon State Forests. Given your lack of accurate age information for the Homesteader Sale areas, I question your ability to make an informed decision in relation to logging the areas you have chosen. Also the economic value to be derived from logging these areas, especially A2, is limited by the characteristics of the large trees (see also #5). Please also look at section 4 of our Homesteader Timber Sale report, where you can find photos of young forest within the Buster “Terrestrial Anchor” that is clearly not High Value Conservation area. **Such areas of young forest need to be exchanged for the exceptionally higher value forest to be found in the Homesteader sale areas.**

5. Older larger trees in relation to regional mills:

Your statement in relation to regional demand for larger logs, appropriately indicates that they need to be high-quality. The logs that would be produced by the large trees in Homesteader Sale areas, especially A2, will not be high-quality. They will have large numbers of large, loose knots. **It will be a waste to convert high quality habitat and genetic diversity trees into low value logs.** The economic benefit of logging is likely to minimal. This is a poor alternative to the higher and increasing habitat values represented by these areas as intact forest.

6. Pre-operations report details:

In our view, more adequate data in your pre-operations report should have directed your decision toward intact forest

protection rather than logging. The time for thoughtful consideration of your management decision is now. We appreciate your indication that “thoughtful consideration will be made in the field when determining which trees should be retained.” However, as you can see from the above responses, retaining a few trees is not the answer. **A thoughtful management process clearly needs to focus on retaining and protecting these proposed sale areas as intact forest, NOT a landscape with a few leave trees - no matter how “thoughtfully” considered.**

Thank you for attending to my extensive reply. The issues relevant to the proposed Homesteader Timber Sale are extremely important and very worth our most careful attention – especially before further developing plans for this proposed timber sale. **Now is the time to turn our attention from pushing this timber sale forward to including these areas in the Buster Terrestrial Anchor in order to make it more of a high value wildlife conservation area.**

Thank you again,
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“Enclosures”:
Dan Goody’s June 24, 2014 letter

Homesteader Area Number Relationships and Notes

The report: “Homesteader Timber Sale; Astoria District, Clatsop State Forest.