



Western Oregon State Forests HCP Update

Oregon Board of Forestry
October 6th, 2020

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KEARNS WEST

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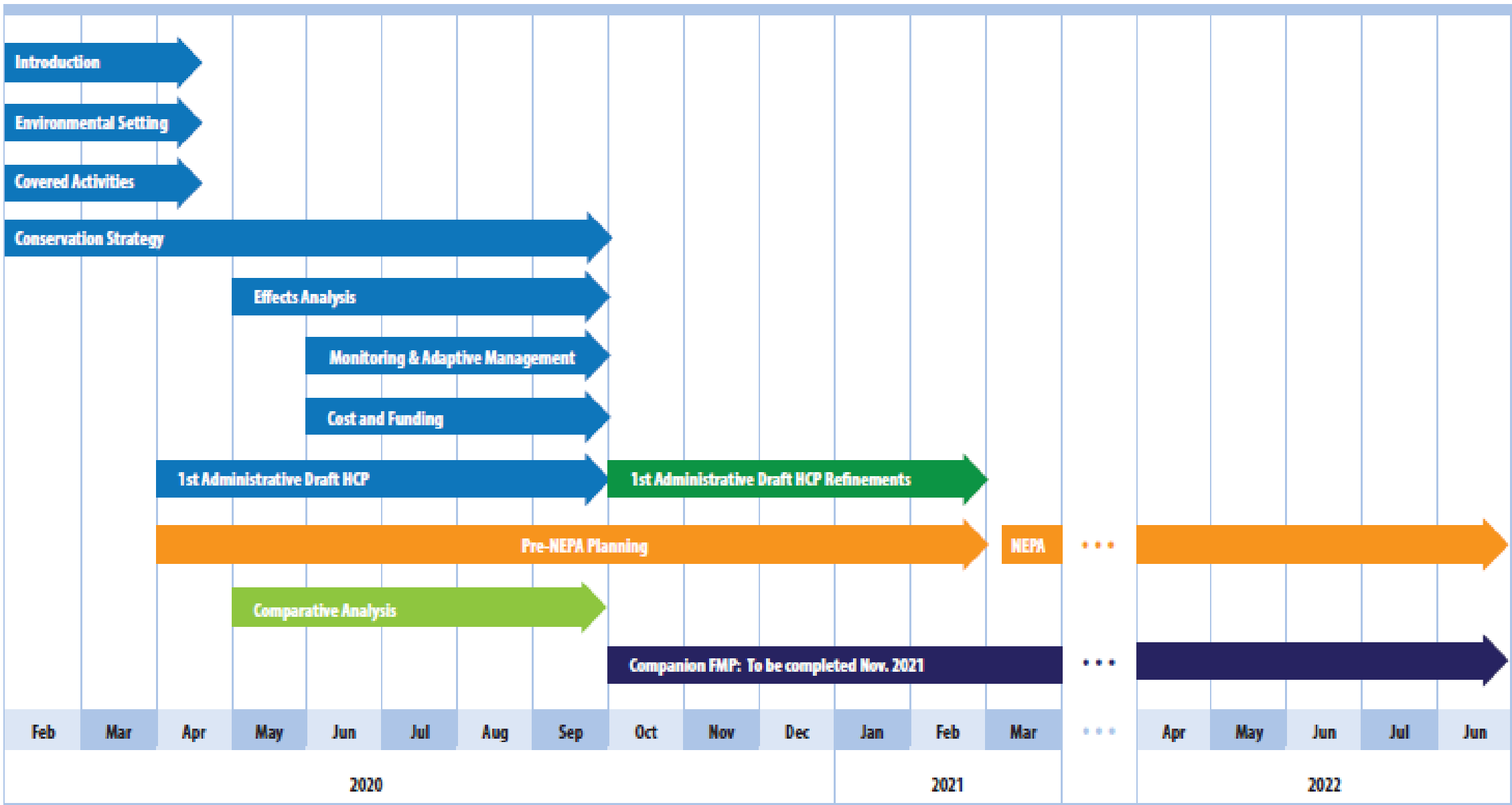


Topics to be Covered

- Process Update
- Draft HCP Key Concepts
 - Effects Analysis
 - Conservation Strategies
 - Monitoring
 - Cost and Funding
- Comparative Analysis
- County & Stakeholder Engagement

Introduction

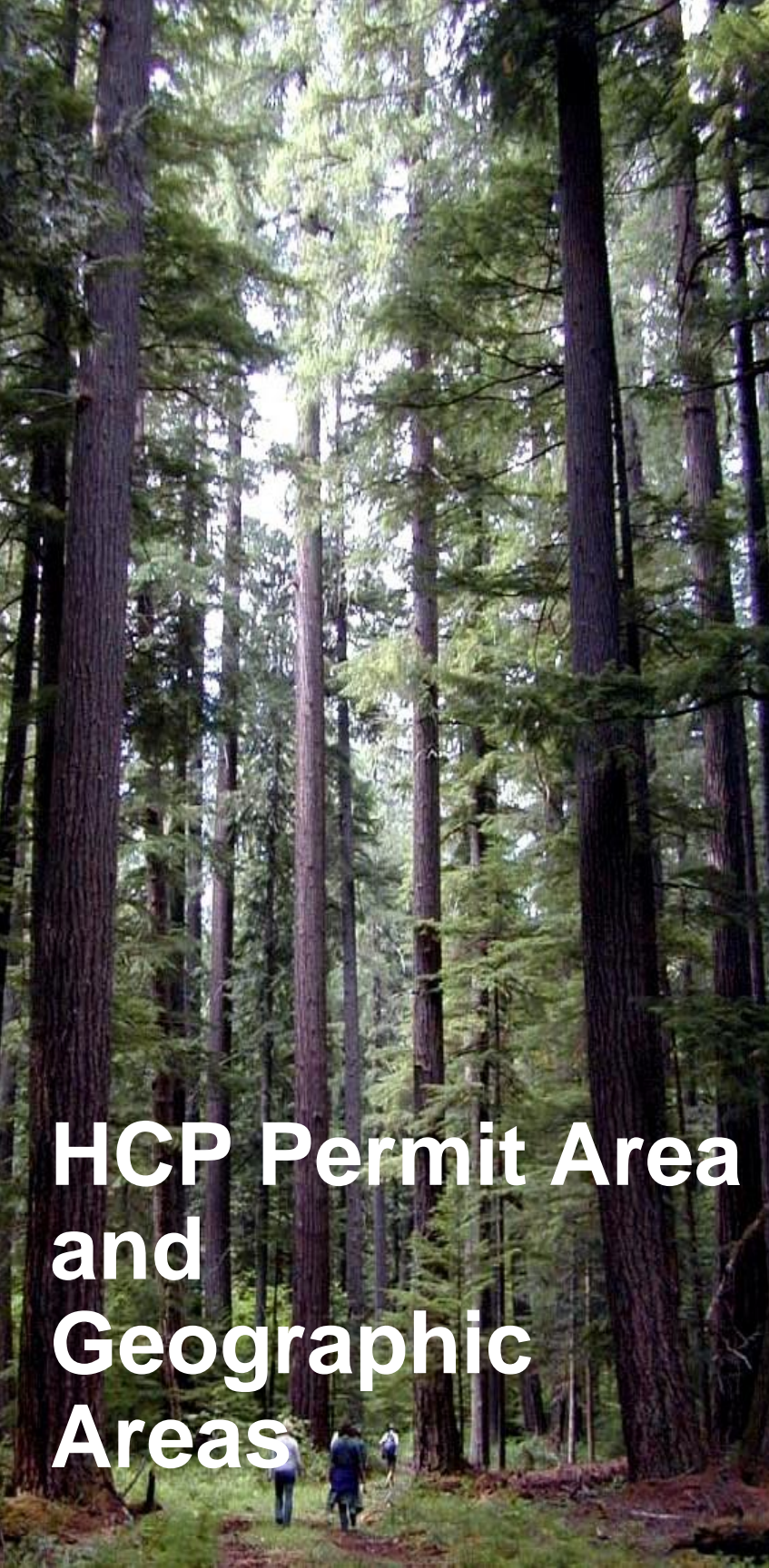
Draft HCP Development Timeline



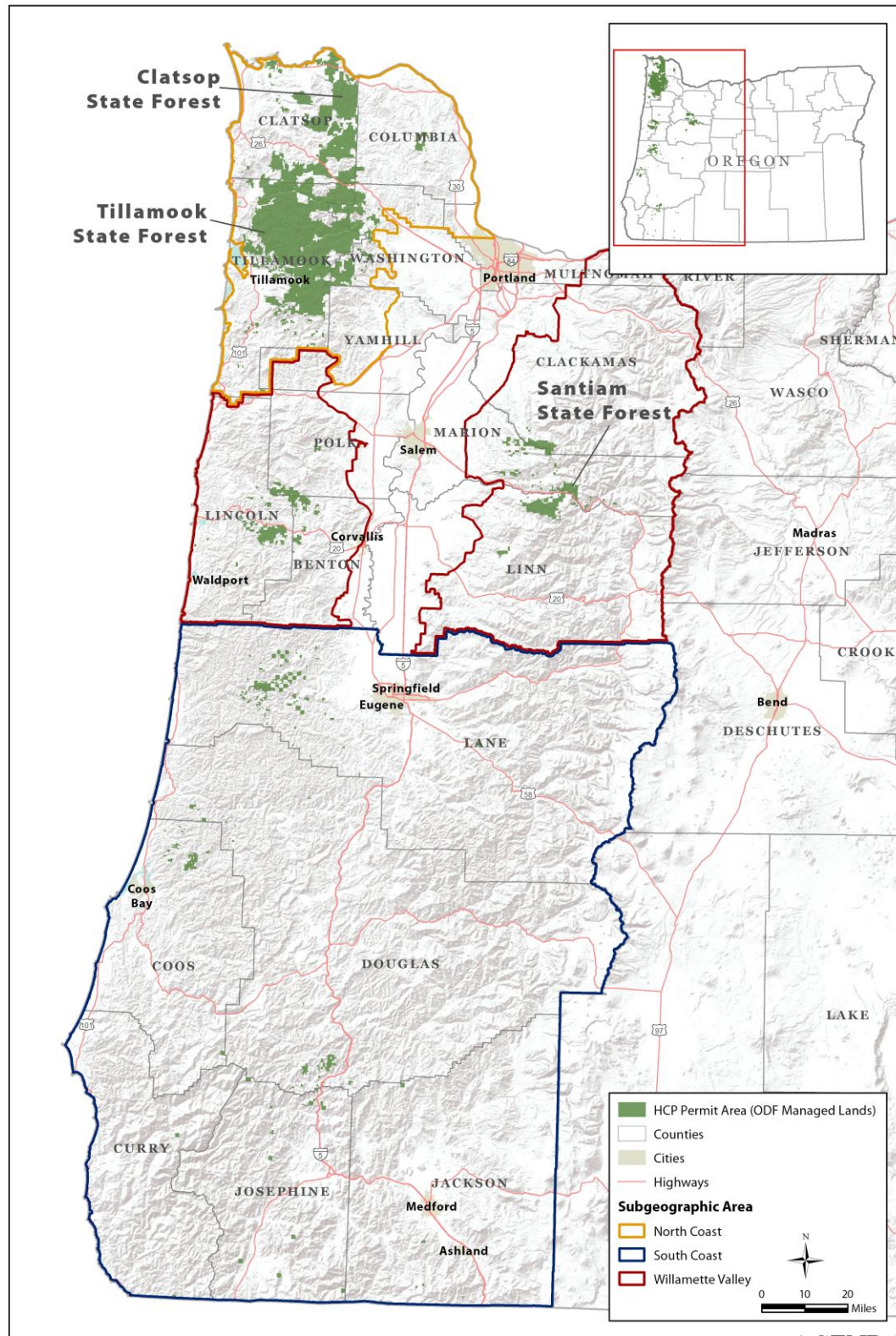


Draft HCP Review

- Geographic Area
- Covered Activities
- Covered Species
- Conservation Actions
- Effects Analysis
- Monitoring
- Cost and Funding



HCP Permit Area and Geographic Areas





Covered Species

- Oregon Coast coho (*Oncorhynchus kisutch*)
- Lower Columbia River coho (*O. kisutch*)
- Oregon Coast spring chinook (*O. tshawytscha*)*
- Upper Willamette River spring chinook (*O. tshawytscha*)
- Upper Willamette River winter steelhead (*O. mykiss*)
- Lower Columbia chum (*O. keta*)
- South Oregon/Northern California coho (*O. kisutch*)
- Lower Columbia chinook (*O. tshawytscha*)
- Eulachon (*Thaleichthys pacificus*)

- Oregon slender salamander (*Batrachoseps wrighti*)*
- Columbia torrent salamander (*Rhyacotriton kezeri*)*
- Cascade torrent salamander (*R. cascadae*)*

- Northern spotted owl (*Strix occidentalis*)
- Marbled murrelet (*Brachyramphus marmoratus*)

- Red tree vole (*Arborimus longicaudus*)*
- Coastal marten (*Martes caurina caurina*)

*Species that are not currently listed under the endangered species act



HCP Purpose

- Avoid, Minimize, and Mitigate the impact of take of federally listed species
- Results in permits under the ESA from USFWS and NOAA Fisheries
- Creates operational certainty over the 70-year permit term
- Creates certainty in the quality and quantity of conservation outcomes over the 70-year permit term
- Establishes a monitoring and adaptive management program to track progress
- No Surprises assurance



Key Elements

- Covered Activities
- Covered Species
- Conservation Strategy
- Effects Analysis
- Monitoring and Adaptive Management
- Implementation
- Cost and Funding



Conservation Strategy Summary

■ Aquatic Conservation Strategy

- Riparian conservation areas
- Road system management
- Stream enhancement
- Barrier removal

■ Terrestrial Conservation Strategy

- Habitat conservation areas
- Upland habitat management
- Retention commitments
- Strategic species actions

■ Establish Conservation Fund

A photograph of a dense forest with tall, thin trees and a path where people are walking.

Effects and Conservation Strategy

- Effects Analysis
- Conservation Actions
- Monitoring



Terrestrial Effects Analysis

- Conducted for each covered species
- Evaluated whether covered activities would:
 - Cause direct mortality to known locations of covered species (e.g., nest sites)
 - Result in loss of suitable or highly suitable habitat over time
 - Result in indirect effects over the long term (e.g., increase predation risk)
- Determined that effects could be minimized and mitigated through a series of conservation actions



Terrestrial Conservation Actions

- Establish Habitat Conservation Areas (HCAs)
- Prioritized areas in HCAs where:
 - Species are known to occur,
 - Suitable and highly suitable habitat occurs or will occur,
 - Habitat connectivity on the landscape
 - HCAs encompass nearly all suitable and highly suitable habitat in the permit area now, and nearly all known species occurrences

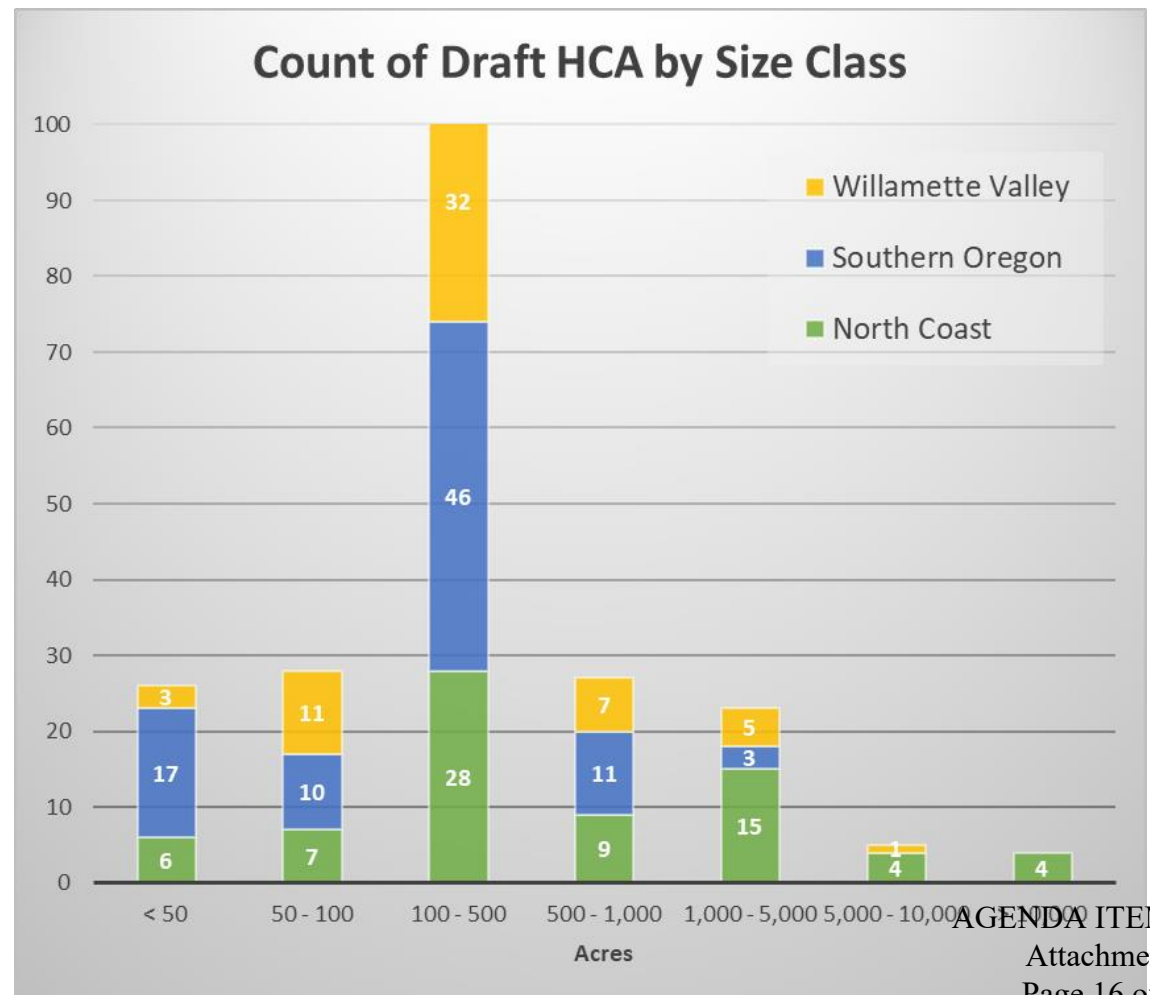


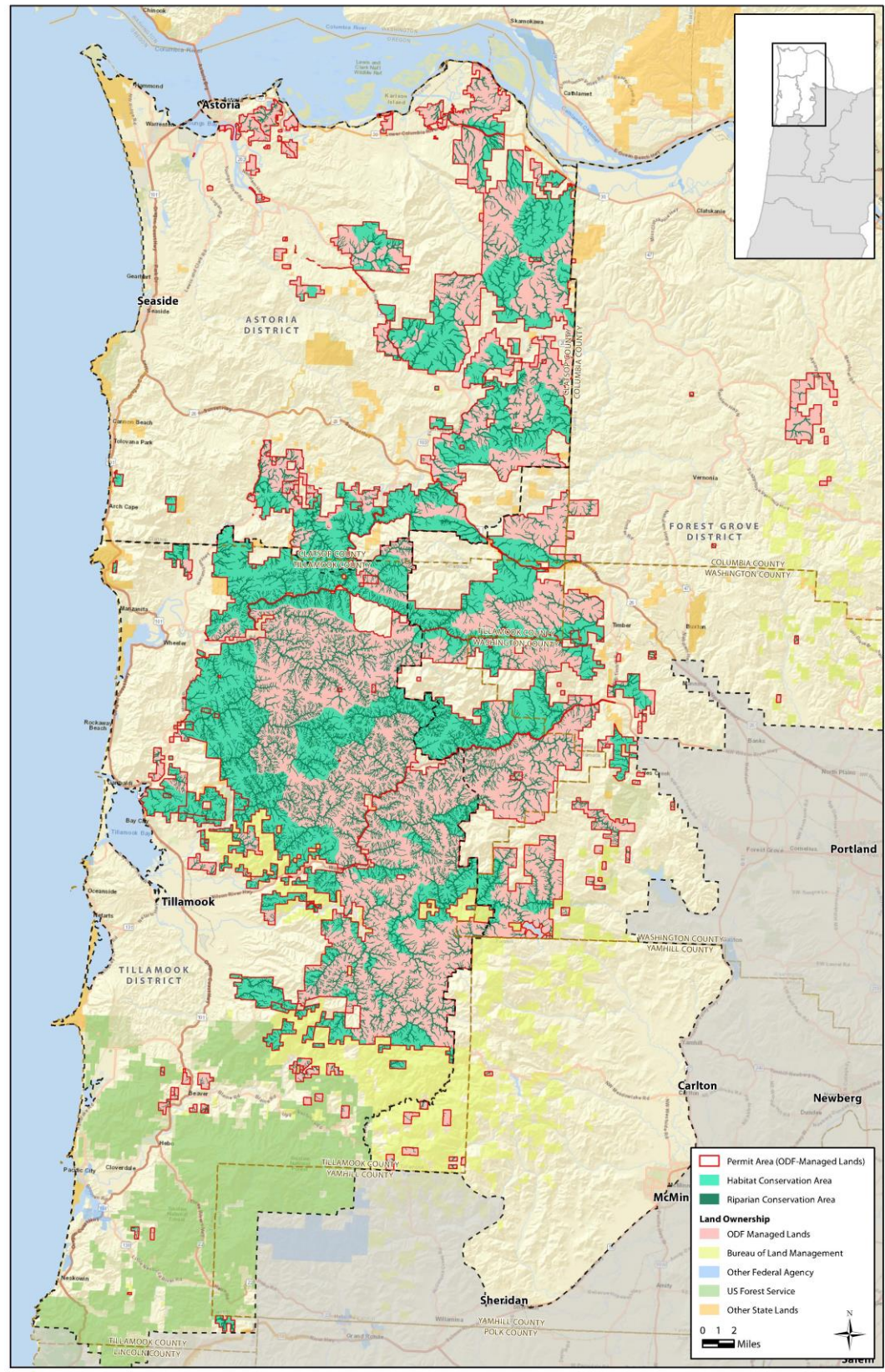
Summary of Draft HCAs

Final Draft HCA Size and Distribution

Permit Area	275,000 (43%)
North Coast	217,000 (43%)
Willamette Valley	33,000 (40%)
Southern Oregon	25,000 (47%)

Sizes of Draft HCAs vary across Permit Area





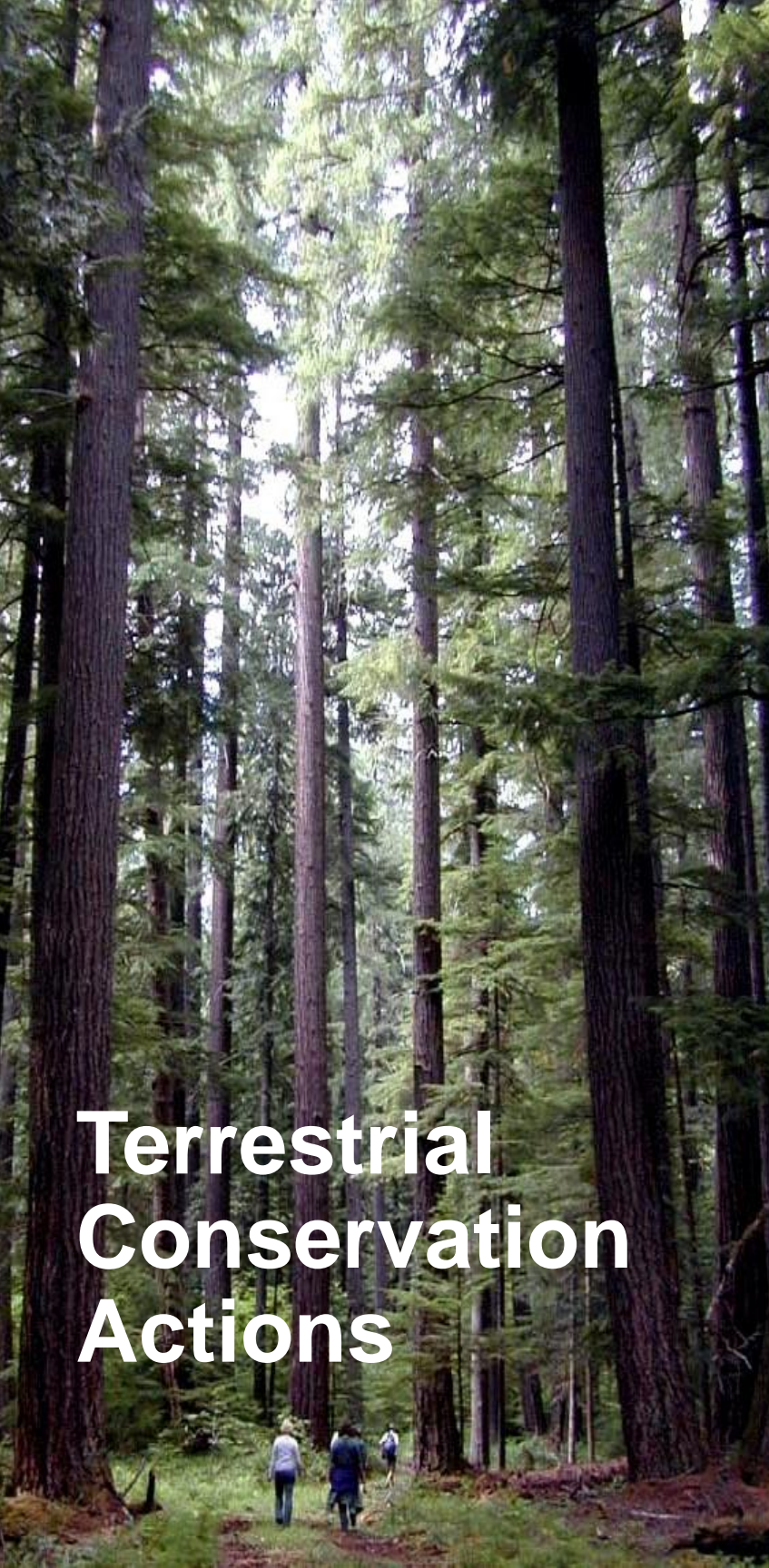
Western Oregon State Forest HCP – Habitat Conservation Areas, Astoria, Forest Grove, and Tillamook Districts



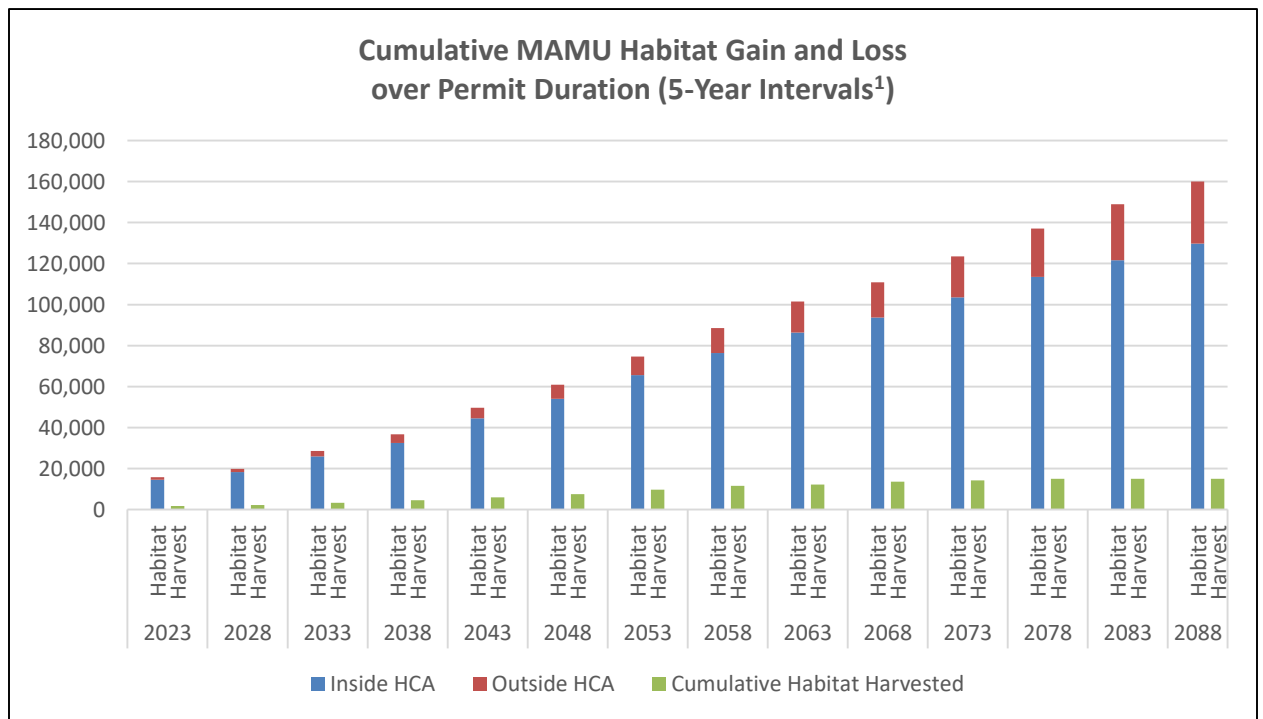
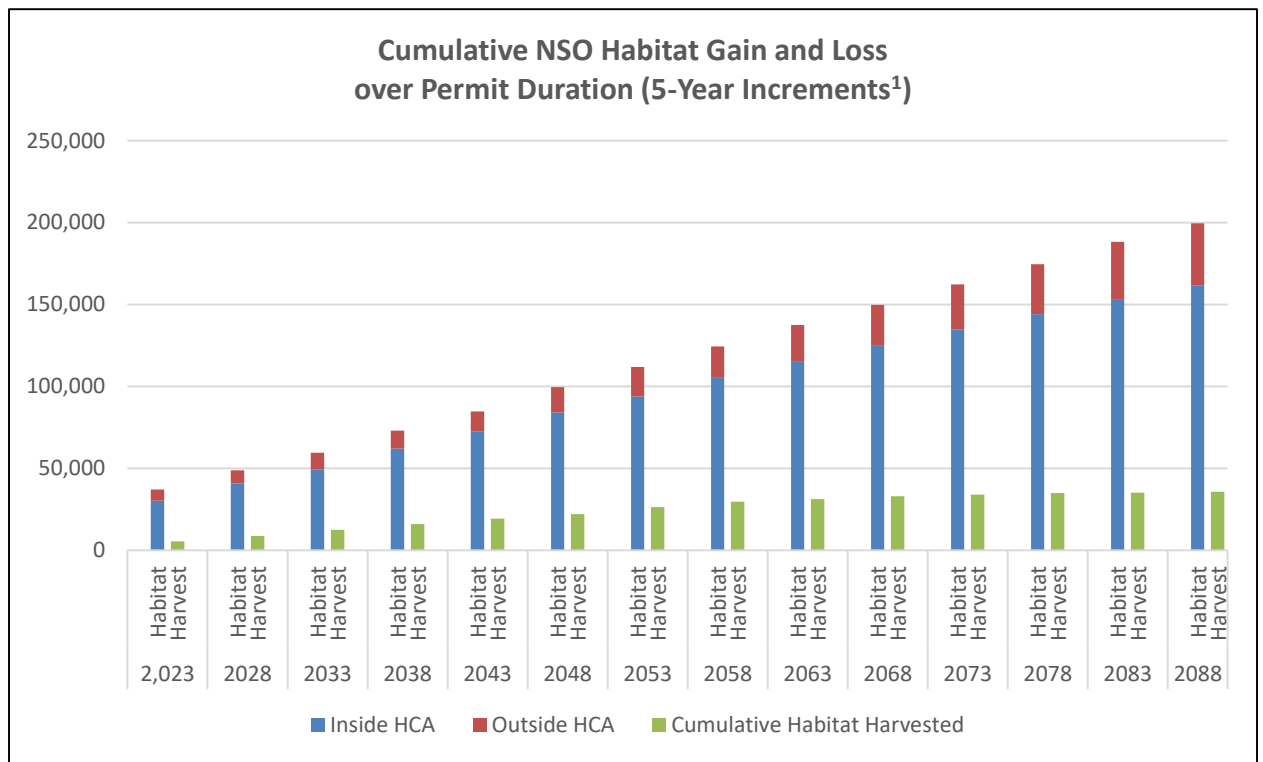


Terrestrial Conservation Actions

- Conduct management actions in HCAs to improve habitat over time
- Focus:
 - Young, simple stands/plantations
 - Conifer restoration (alder, SNC)
- Pace:
 - First 30-years of permit term
 - Annual targets (ac/yr)
- Scale:
 - 1/3rd inoperable, RCAs, inner gorges
 - 1/3rd existing T&E sites or high quality habitat
 - 1/3rd candidates for management



Terrestrial Conservation Actions





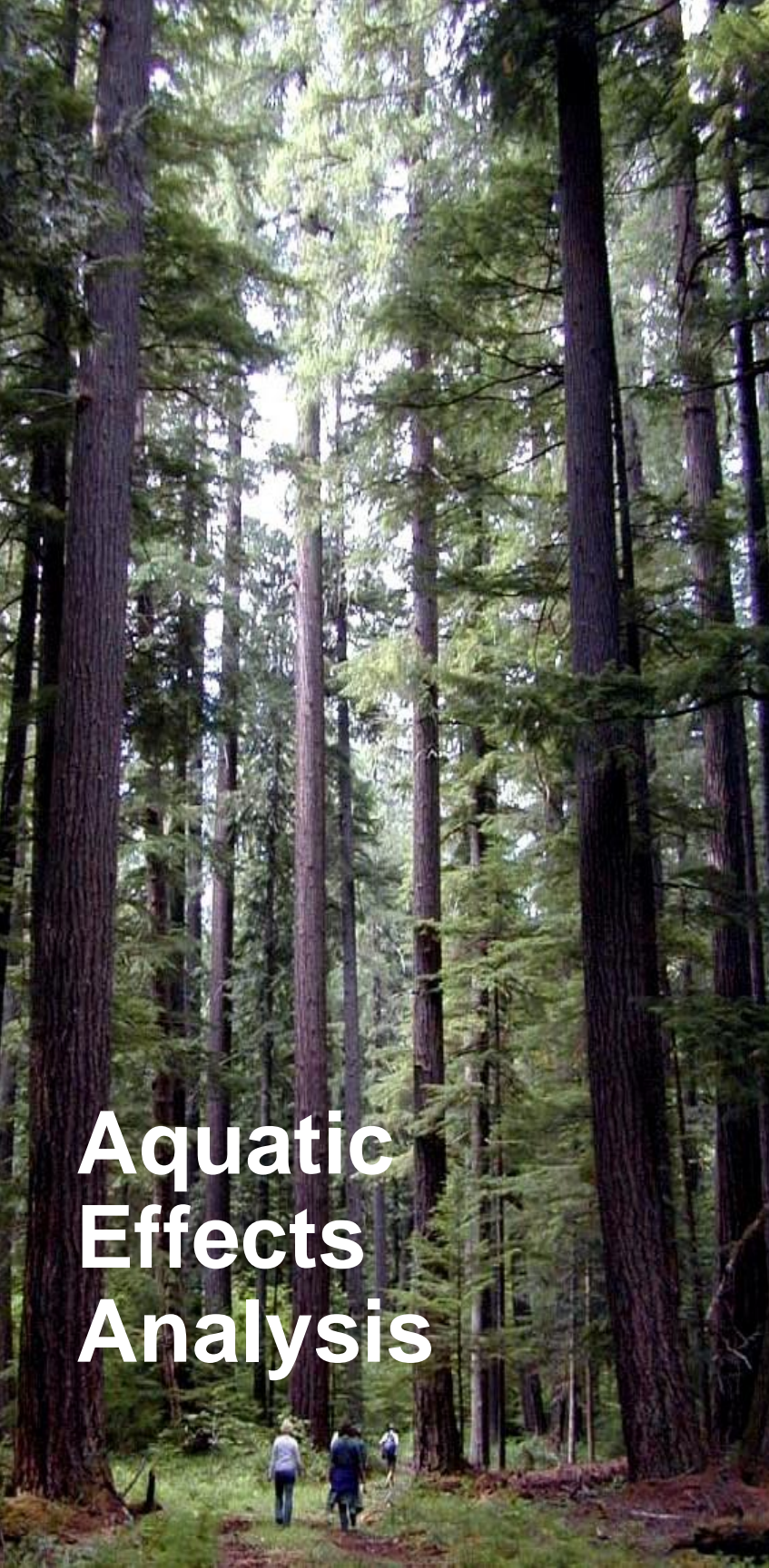
Terrestrial Conservation Actions

- Minimize effects on known species locations (i.e., nest sites) through seasonal and other restrictions
- Utilization of the conservation fund for
 - Reforestation activities in HCAs
 - Targeted species conservation actions
 - Barred owl management
 - Captive breeding and reintroduction
 - Other research
 - New stressors
- Monitoring Program



Terrestrial Species Monitoring

- Focus on changes in habitat quality over time (every 5-years)
 - Habitat lost to covered activities
 - Habitat gained through growth
- Currently suitable habitat and species occurrence
- Species response to newly suitable habitat
- Silvicultural actions in HCAs to manage the pace and scale
- Tied to broader AM program and IP process.



Aquatic Effects Analysis

- Conducted analysis by Evolutionarily Significant Unit (ESU) for each covered species
- Evaluate whether covered activities would:
 - Cause direct mortality to covered fish or aquatic amphibians
 - Inhibit the recruitment of large wood
 - Increase stream temperature in fish-bearing waters
 - Increase sediment delivery into the stream network
- Address how conservation actions will minimize and mitigate negative effects

Riparian Conservation Areas

Table 4-3. Minimum Buffer Widths (Horizontal Distance) for All Type F and Large and Medium Type N

Stream Type	Minimum Management Area Width (feet)	
	Type F	Type N
Large	120	120
Medium	120	120
Small	120	See Table 4-4
Seasonal ^a	120	See Table 4-4

^a Seasonal: A stream that does not have surface flow after July 15.

Table 4-4. Minimum Riparian Conservation Area Widths (Horizontal Distance) for Small Perennial and Seasonal Type N Streams

Stream Type	Minimum Management Area Width (feet)	
	Within 500-foot Temperature Zone	Upstream of 500-foot Temperature Zone
Perennial small Type N	120	35
Potential debris flow track (Seasonal Type N) ^a	50	35
High energy (Seasonal Type N) ^b	50	35
Seasonal other (Type N) ^c	0 ^d	0 ^d

Notes:

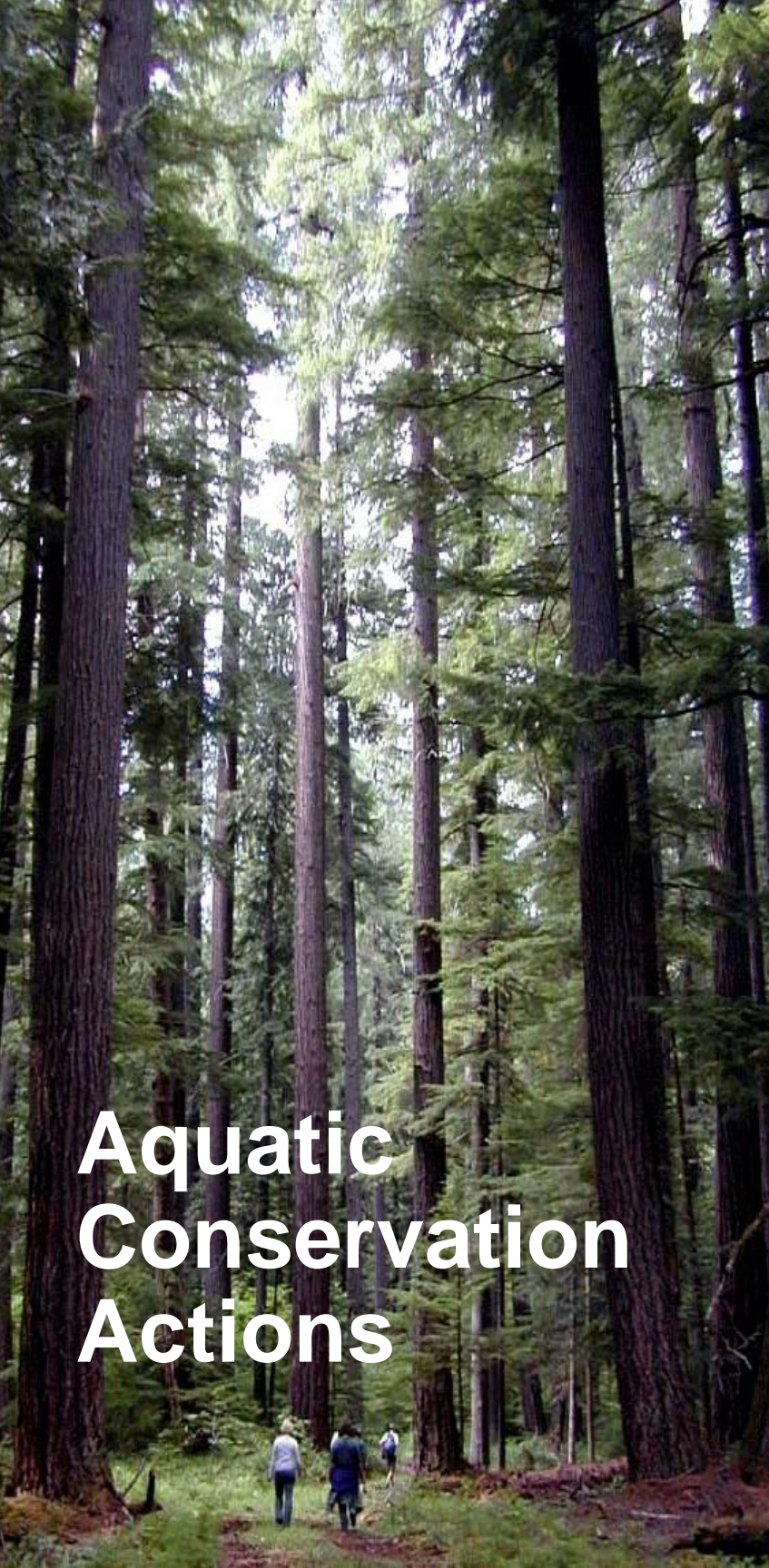
^a Potential debris flow tracks: Reaches on seasonal Type N streams that have a high potential of delivering wood to a Type F stream.

^b High Energy: Reaches on seasonal Type N streams that have a high potential of delivering wood and sediment to a Type F stream during a high-flow event.

^c Seasonal: A stream that does not have surface flow after July 15.

^d A 35-foot equipment restriction zone will apply to these streams.

Riparian Conservation Areas (RCA)



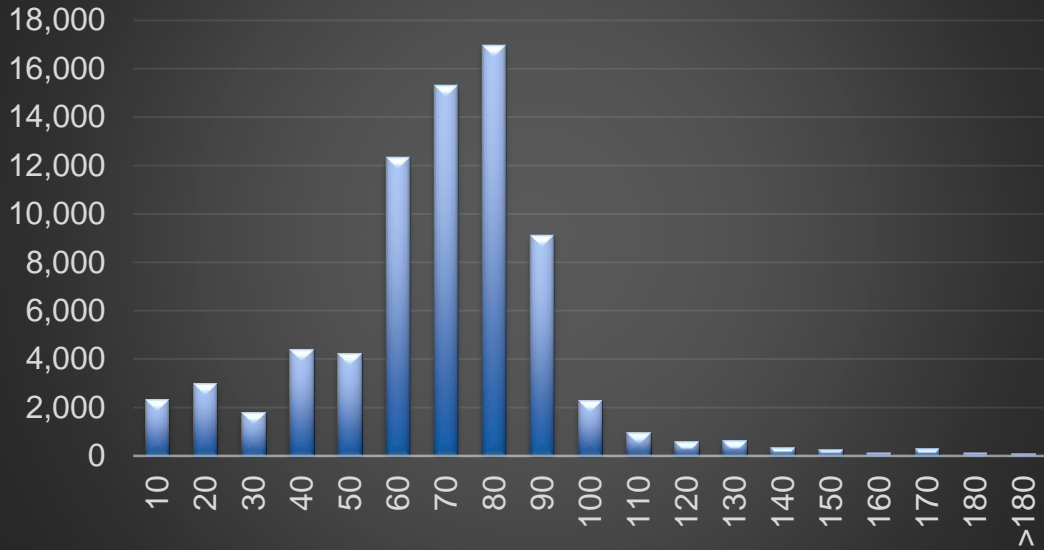
Aquatic Conservation Actions

- **Commit** to aquatic enhancement projects through the conservation fund that focus on:
 - Addressing limiting factors for each ESU
 - Improving fish habitat, including LWD enhancement in strategic locations
 - Removal of fish barriers to increase access to habitat
 - Floodplain reconnection projects

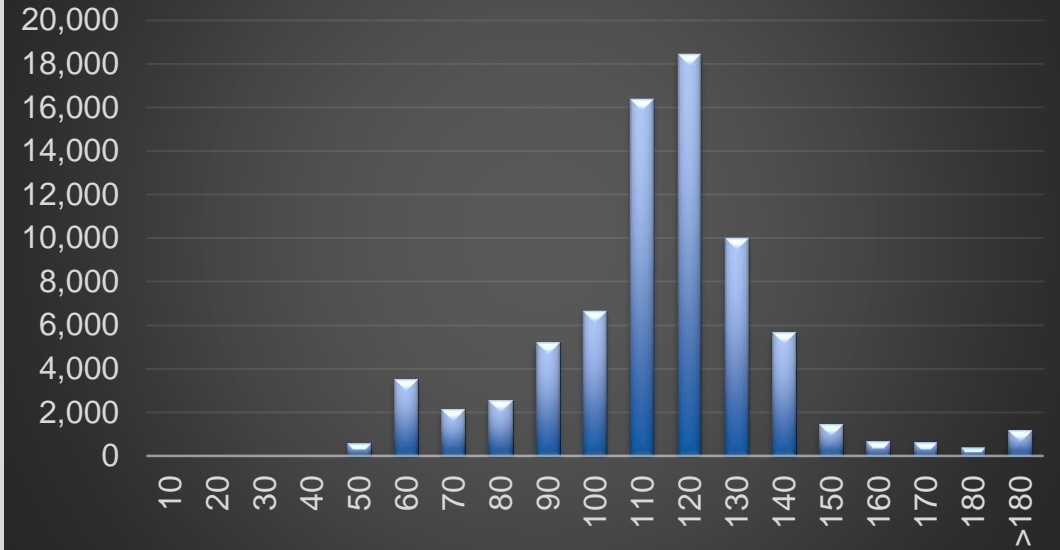
- **Monitoring**
 - Coordinated with ODFW's Aquatic Inventory Program
 - Stream temperature changes over time
 - Sedimentation related to fish habitat quality
 - Number of pieces and volume of large woody debris

Change in RCA Stand Age During Permit Term

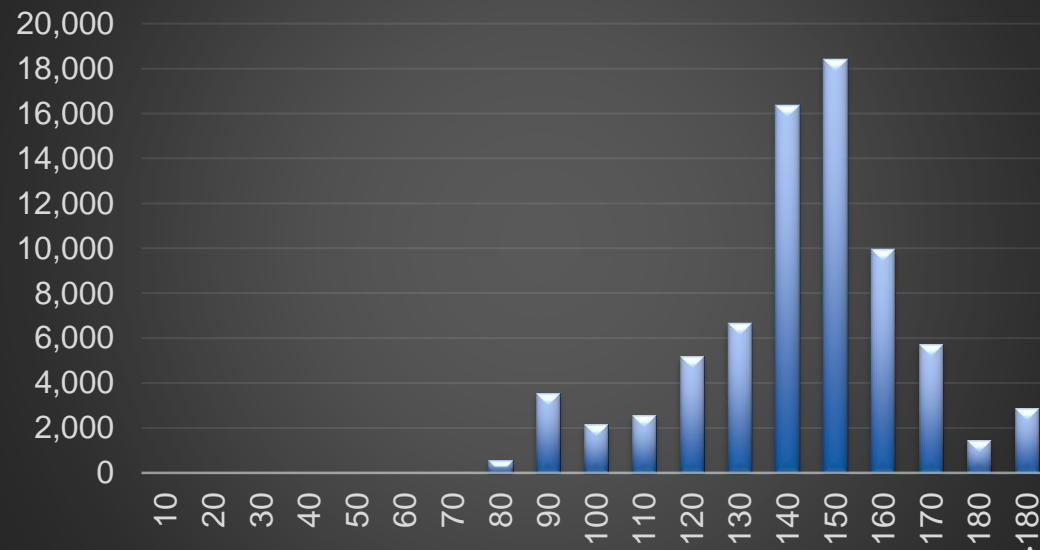
HCP RCA Stand Age - 2023



HCP RCA Stand Age - 2068



HCP RCA Stand Age - 2088



77,000 acres total
- 37,000 inside HCAs
- 40,000 outside HCAs

HCA and RCA Statistics

All covered species benefit from both

50% of Permit Area combined

7% of Permit Area in RCA

48% of RCA is within HCA

Total Combined HCA and RCA (to nearest 1,000 acres)

Location	HCAs	RCAs	Total
Permit Area	275,000 (43%)	42,000 (7%)	317,000 (50%)
North Coast	217,000 (34%)	36,000 (6%)	253,000 (40%)
Willamette Valley	33,000 (5%)	4,000 (<1%)	37,000 (6%)
Southern Oregon	25,000 (4%)	2,000 (<1%)	27,000 (4%)



Reporting Requirements

▪ Annual Reporting

- Compliance reporting on covered activities
- Species and habitat survey results
- Conservation Fund expenditures

▪ 5-Year Midpoint Check In

- All annual reporting items
- Update on terrestrial species habitat changes (loss/gain)

▪ 10-Year Comprehensive Review

- Assess last 10 years in preparation for next 10-year IP cycle
- Opportunity to adjust policies and programs to more efficiently implement HCP (*adaptive management*)



Adaptive Management Program

- Identifies need for potential adjustments in conservation actions
- Informs changes at both a policy and operational level to most effectively achieve biological goals and objectives
- Timed primarily to match ODF's 10 year Implementation Plan cycle
- Adaptation to climate change in conjunction with other state and federal agencies
- Establishes triggers based on monitoring



Cost and Funding

- Required to estimate cost of HCP and that funding to implement it is assured
- Key HCP Cost Centers include:
 - HCP Administration and Staffing
 - Conservation Strategy
 - Aquatic and terrestrial restoration and enhancement activities
 - Strategic species conservation actions
 - Monitoring
 - Adaptive Management
 - Remedial Measures for Changed Circumstances (defined in HCP)



County and Stakeholder Engagement Update



County and Stakeholder Engagement

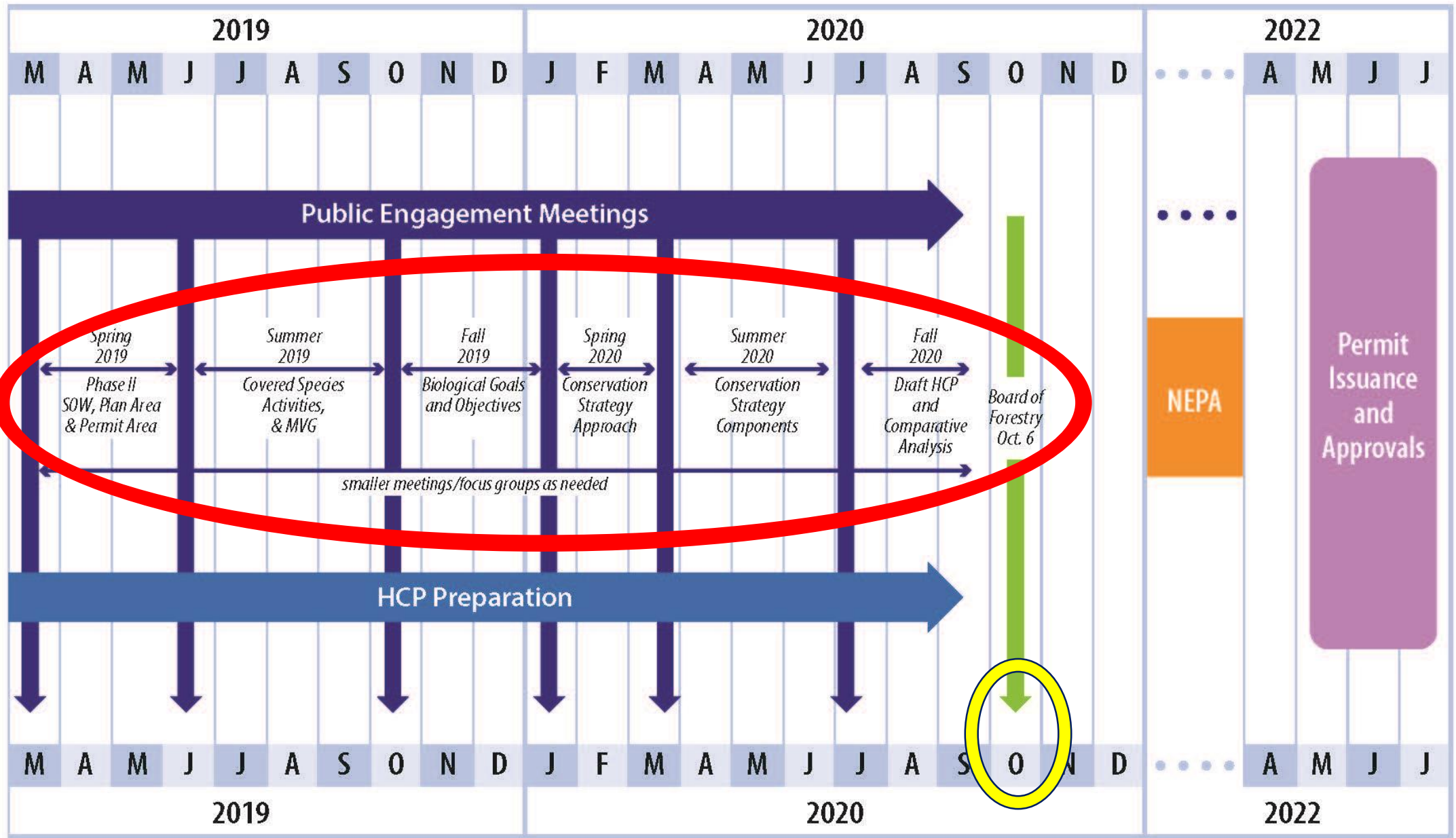
External Engagement

- Broad Public Outreach—open to everyone
- FTLAC and CFTLC
- Stakeholder Meetings
 - Joint
 - Individual
 - SFAC

Internal Engagement

- Scoping Team
- Steering Committee

Western Oregon State Forests HCP Stakeholder Engagement





Western Oregon Comparative Analysis: cFMP, dFMP and HCP

Mark Buckley



Comparative Analysis

HCP Findings Related to Greatest Permanent Value

- Productive, and sustainable forest ecosystems that provide a full range of social, economic, and environmental benefits to the people of Oregon
- Habitat quality and quantity that effectively provides benefits for native wildlife with long-term certainty
- Harvest levels that are sustainable and predictable to generate revenues for the state, counties and local taxing districts



Comparative Analysis

HCP Findings Related to Policy and Business

- Most effective way to comply with the Endangered Species Act (ESA)
- Delivers business certainty on requirements to comply with ESA
- Provides benefits to 16 listed species and overall landscape conservation
- Reduces risk of litigation for ESA species
- Provides a more dependable harvest level over the long-term

Comparative Analysis Purpose

- Compare expected outcomes for alternatives facing the Board of Forestry regarding the HCP and FMP
- Utilize information developed during the HCP process
- Expand analyses beyond financial implications to include conservation objectives



Differences between BCA and CA

- More detailed spatial and non-spatial data on conservation areas and covered species habitat
- Clarity on HCP requirements
- Stand-level habitat suitability and harvest net revenue optimization model



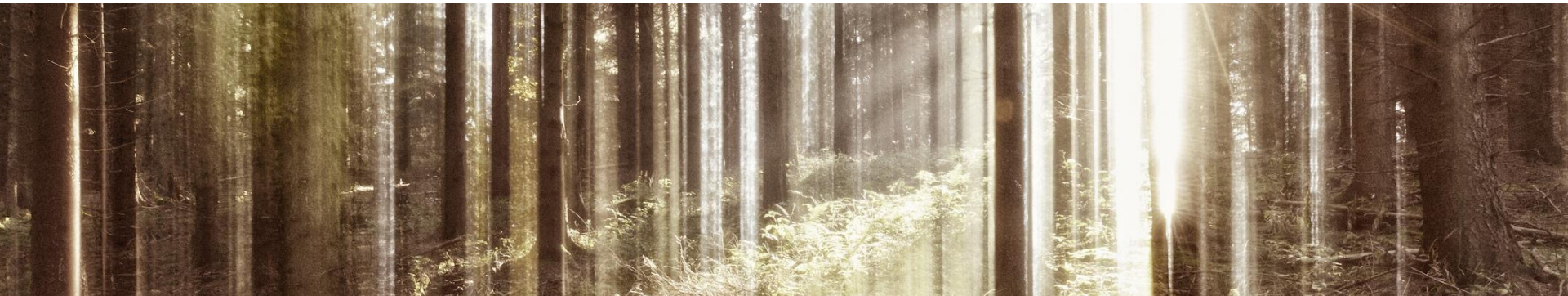
Comparative Analysis Process

- HCP development process
 - Habitat models
 - Scoping and technical committees
- Forest Management Model
 - Linear programming model
 - Optimizes for net present value



Scenarios for Analysis

- cFMP – current FMP
- dFMP – draft revision to current FMP
- HCP – Habitat Conservation Plan
- 75-year timeframe (2023-2097)
- Consider all categories of differences between scenarios



Variables for Analysis

Conservation

- Habitat quality and quantity
 - Terrestrial, Aquatic, Non-covered
- Species monitoring and management
- Habitat fragmentation

Economic

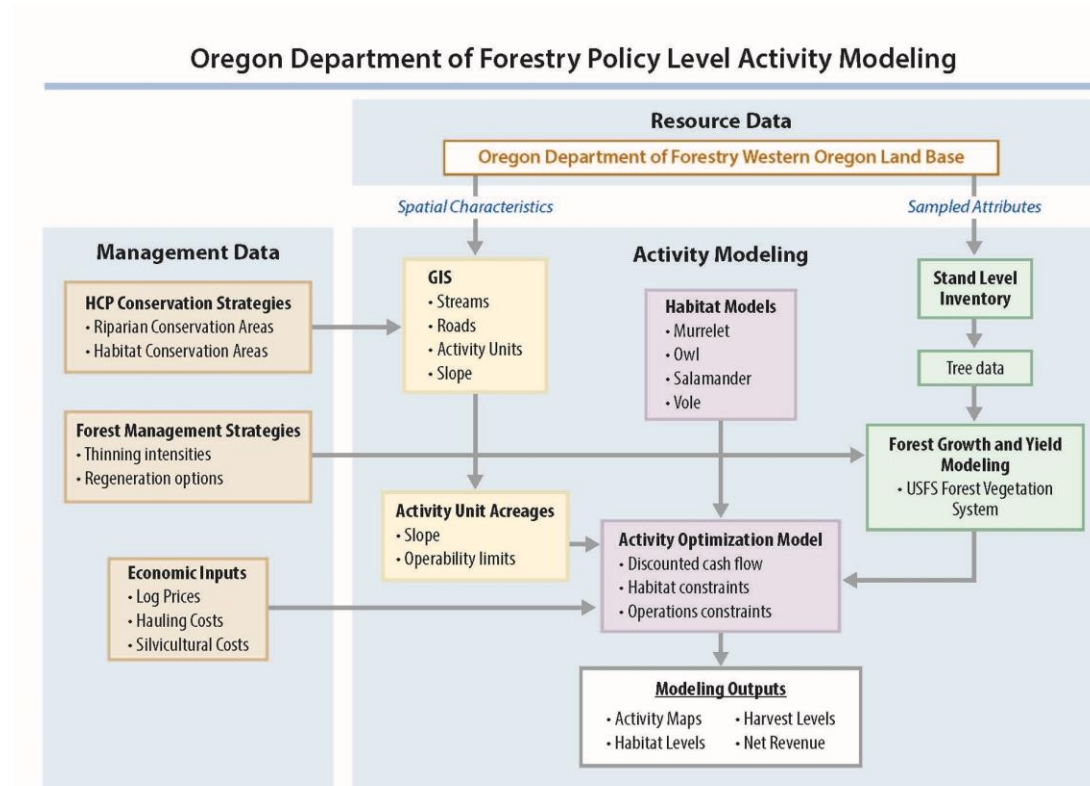
- Timber harvest volume
- Harvest revenue and costs
- Revenue distributions
- ODF net operating income
- Timber inventory

Social

- Carbon sequestration
- Recreational and cultural activities

Policy Level Forest Management Model

- Built by Greg Latta (PhD) with ODF staff
- Stand-level, net harvest revenue optimization model (linear programming)
- Includes land-use constraints
- Includes application of species-specific habitat models
- Provides harvest, revenue, cost, forest inventory, carbon, and habitat outputs

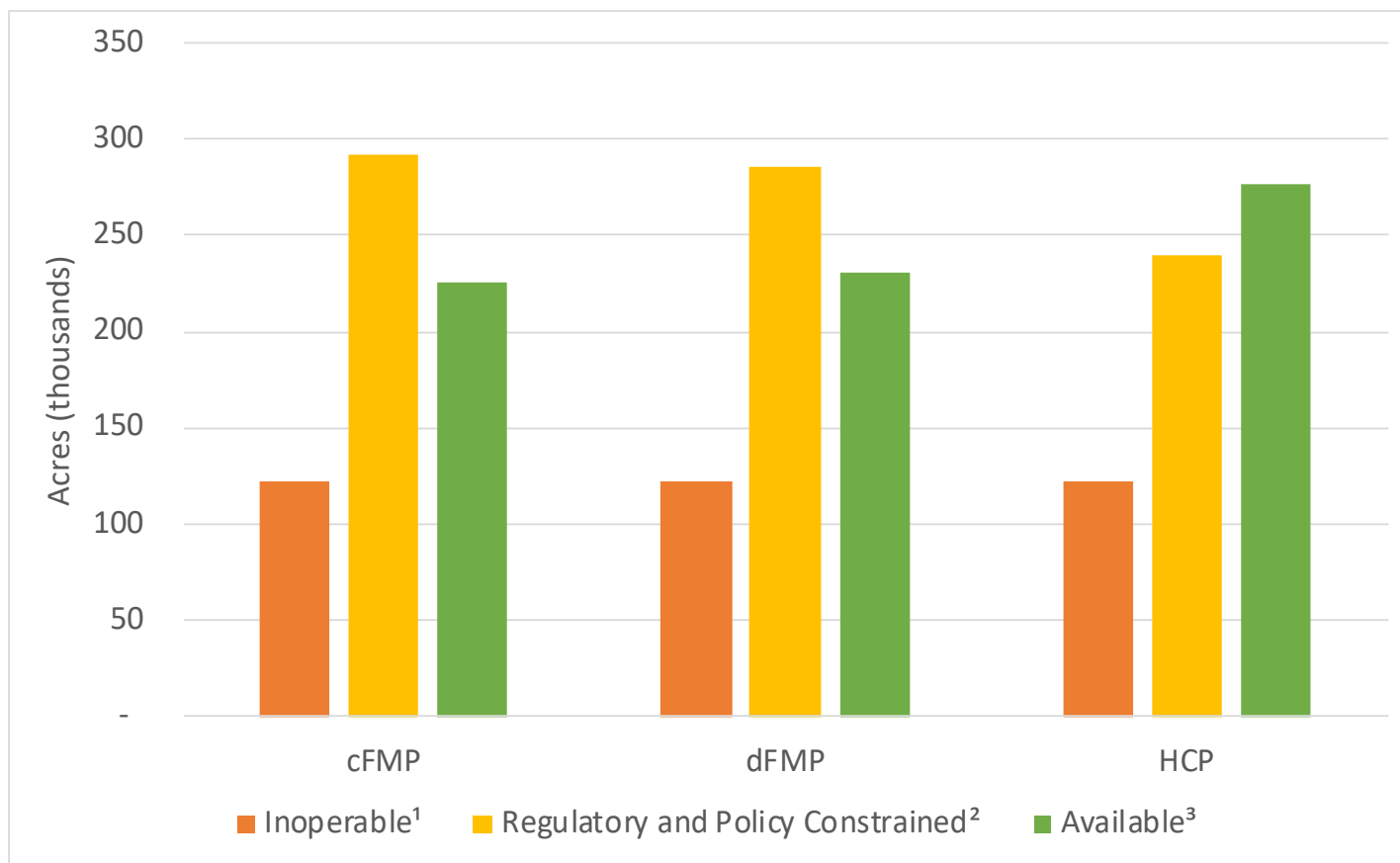


Key Model Assumptions

- 75-year timeframe
- 2017 Stand Level Inventory
- 2019 timber prices
- 2014 harvest costs
- Acres of new habitat constraints outside of landscape designs under cFMP (82k) and dFMP (95k)
- 3k acre increase in riparian buffers with HCP
- Some cost categories increasing over time
 - Species surveys, staff costs, ESA administration



Acreage Constraints (2097)



- HCP has most acreage available for harvest, cFMP has least
- cFMP has most constrained acres, HCP has the least

Conservation Area Configuration

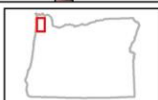
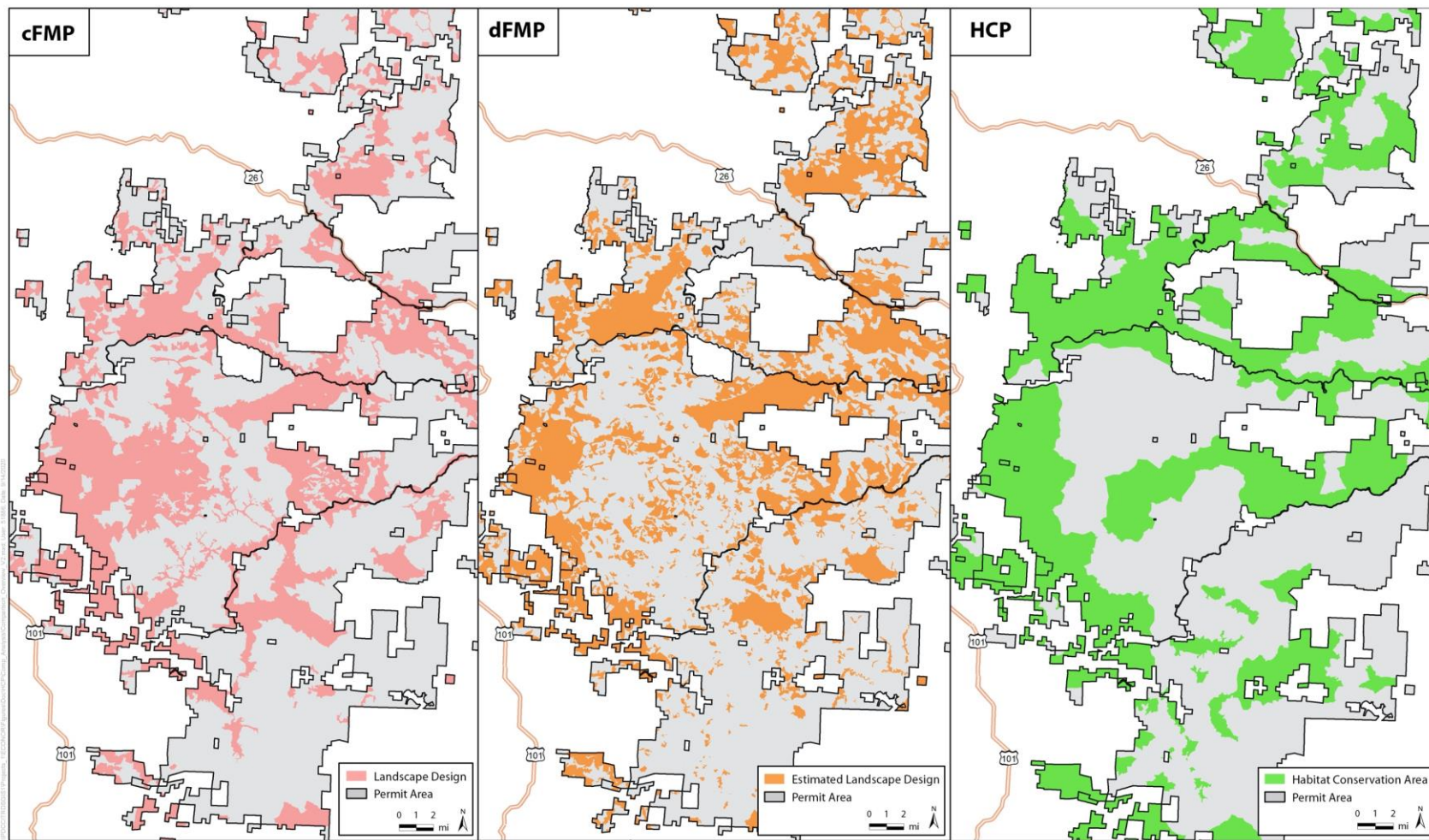
Patches of conservation acres

- HCP has the largest patch sizes (more resilient habitat)
- HCP has the lowest edge ratios (more interior habitat)
- dFMP has smallest patch sizes, least interior habitat

Protected habitat

- dFMP protects largest share of habitat
- HCP protects slightly more habitat than cFMP

Landscape Designs

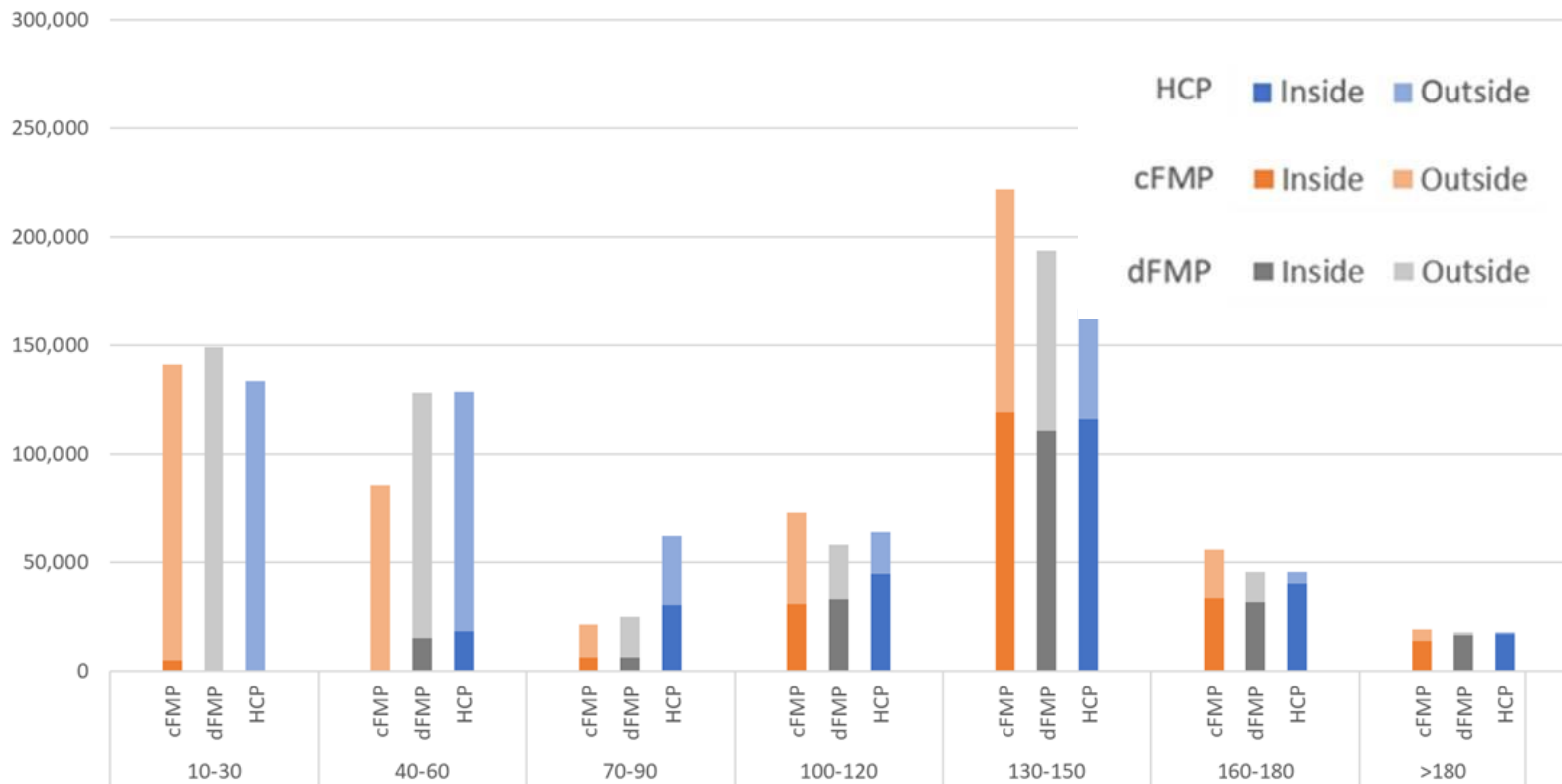


Comparison between the landscape design (cFMP), estimate landscape design (dFMP), and habitat conservation areas (HCP)

- HCP conservation areas in largest clusters

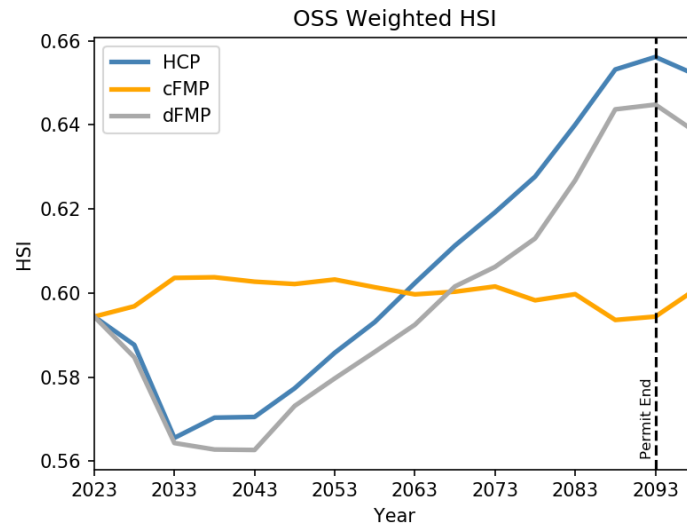
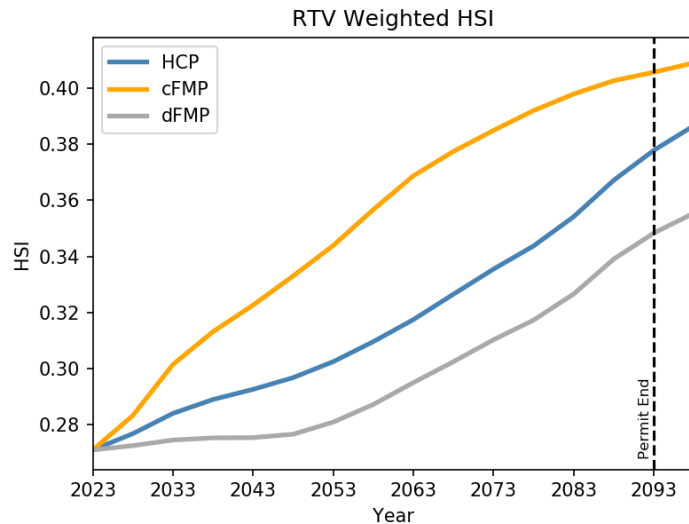
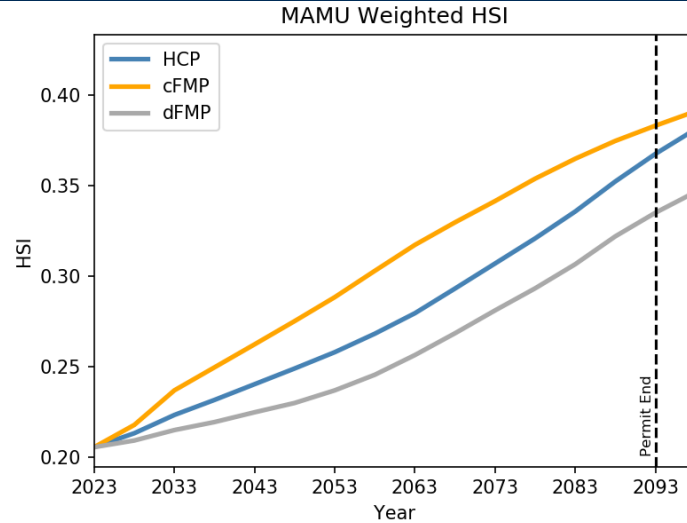
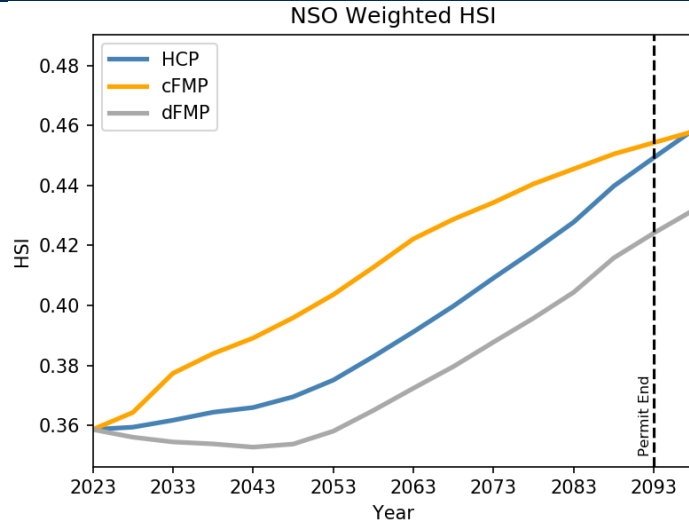
Stand Age and Conservation Protections

Average Forest Stand Age Class Distribution Inside and Outside Areas Designated for Conservation - 2083 - 2097 (acres)



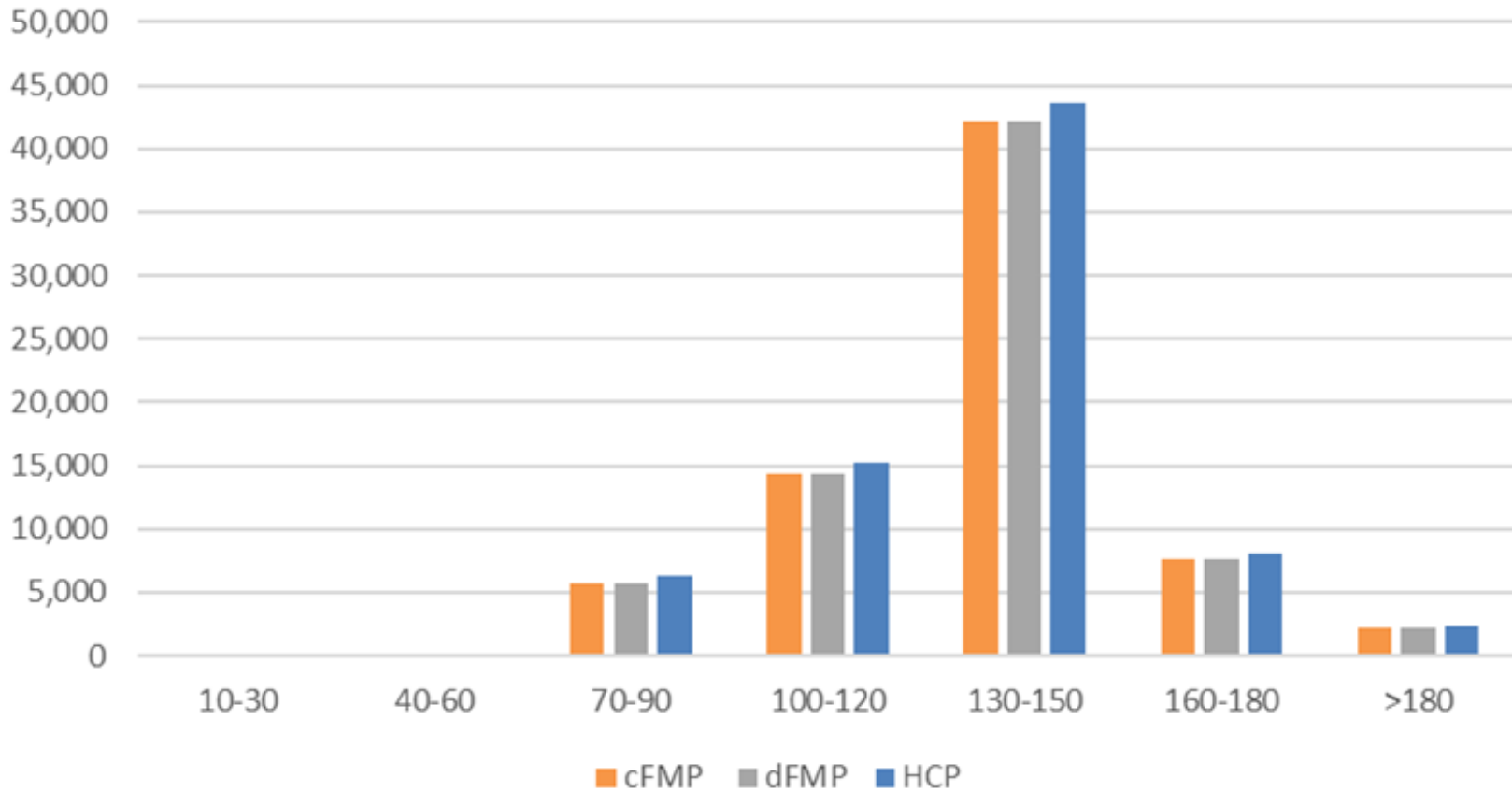
- cFMP has oldest stands
- HCP protects the most old stands

Habitat Suitability



- Suitable habitat increases for all three scenarios
- cFMP has the most suitable habitat (weighted by area)

Riparian Age Classes (2097)



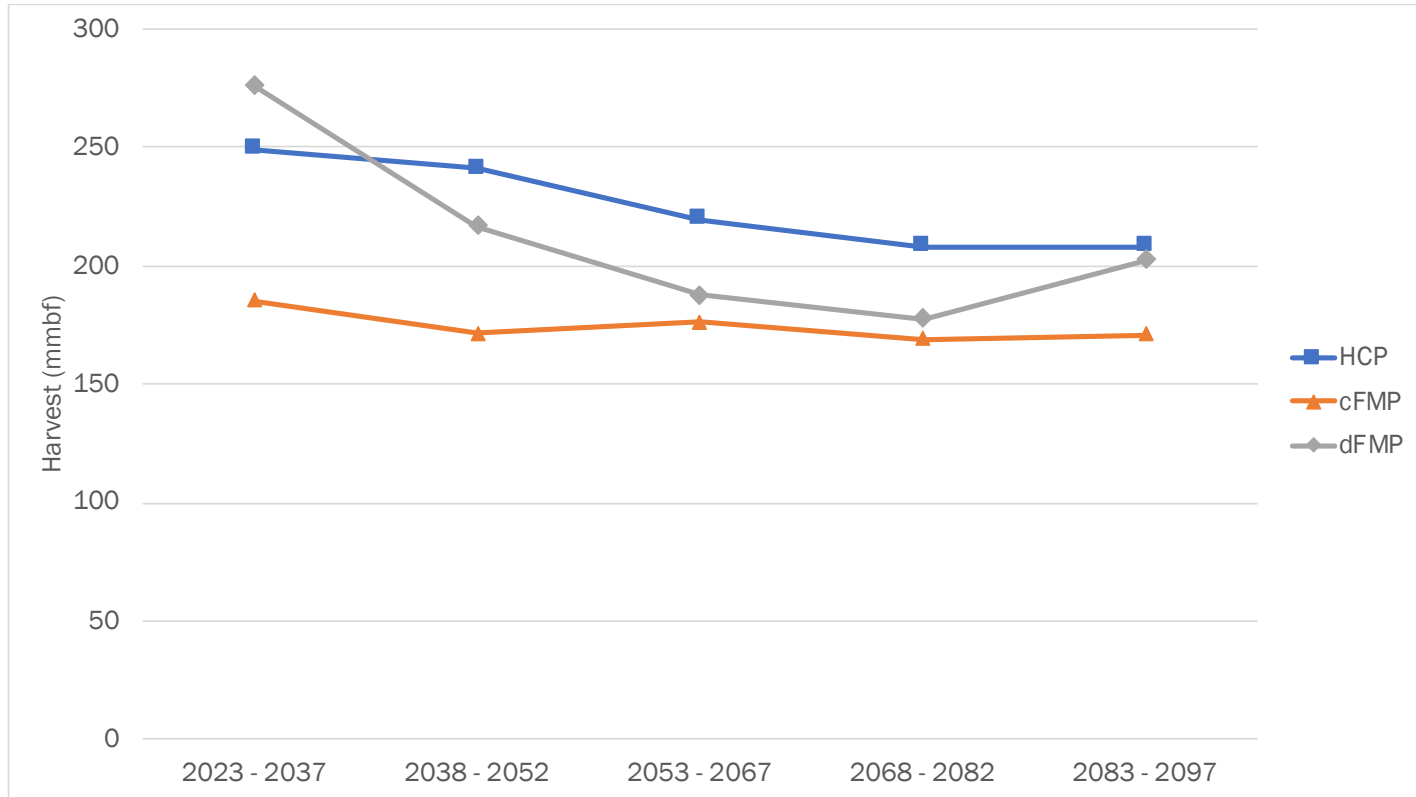
- Aquatic strategies for all three scenarios are strong
- HCP provides the best potential outcomes

Timber and Economic Analysis

- Harvest Volume
- Harvest Costs and Revenue
- ODF Costs
- Net Revenue
- Distributed Revenue
- ODF Net Operating Income (NOI)

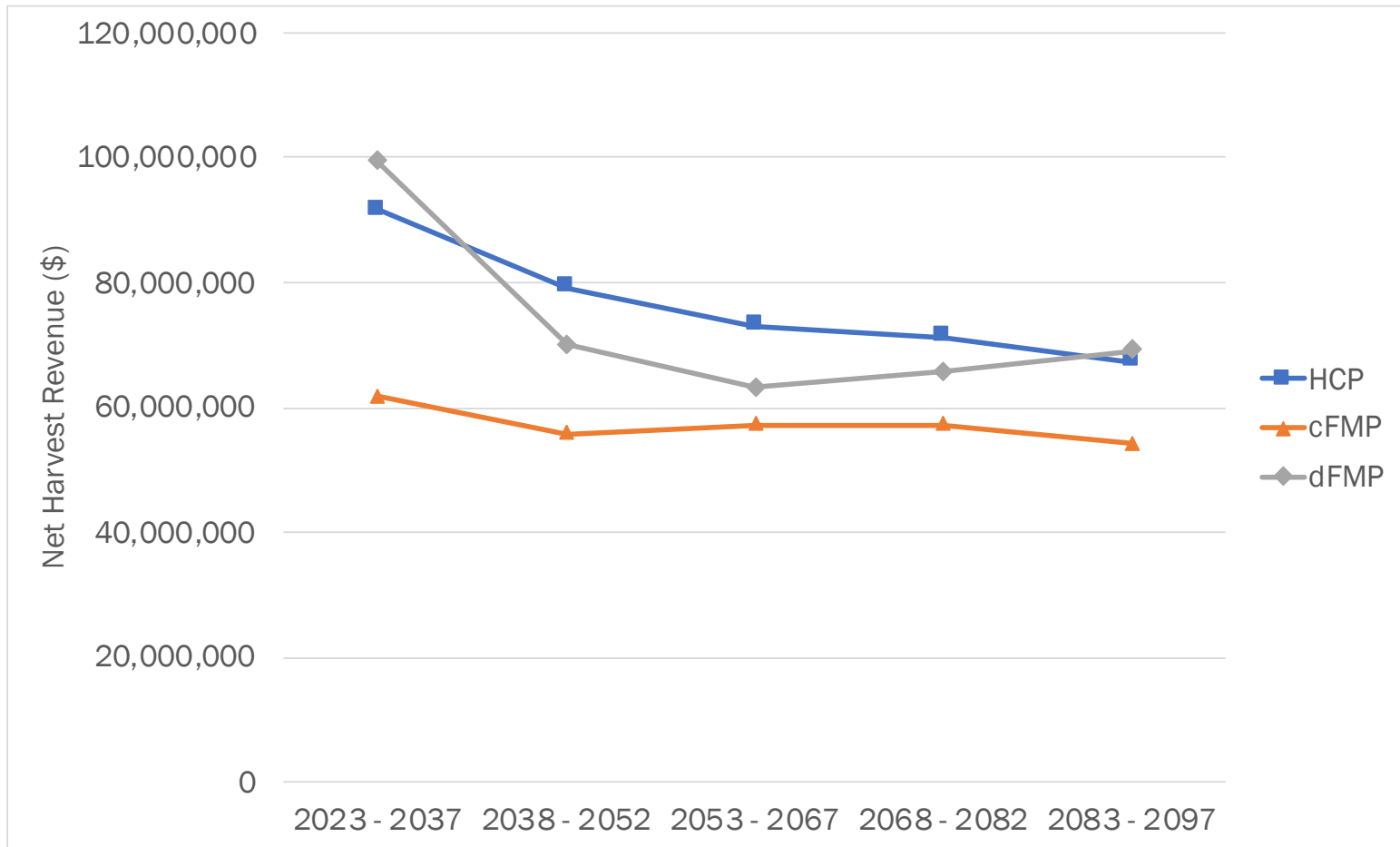


Average Annual Harvest Volume



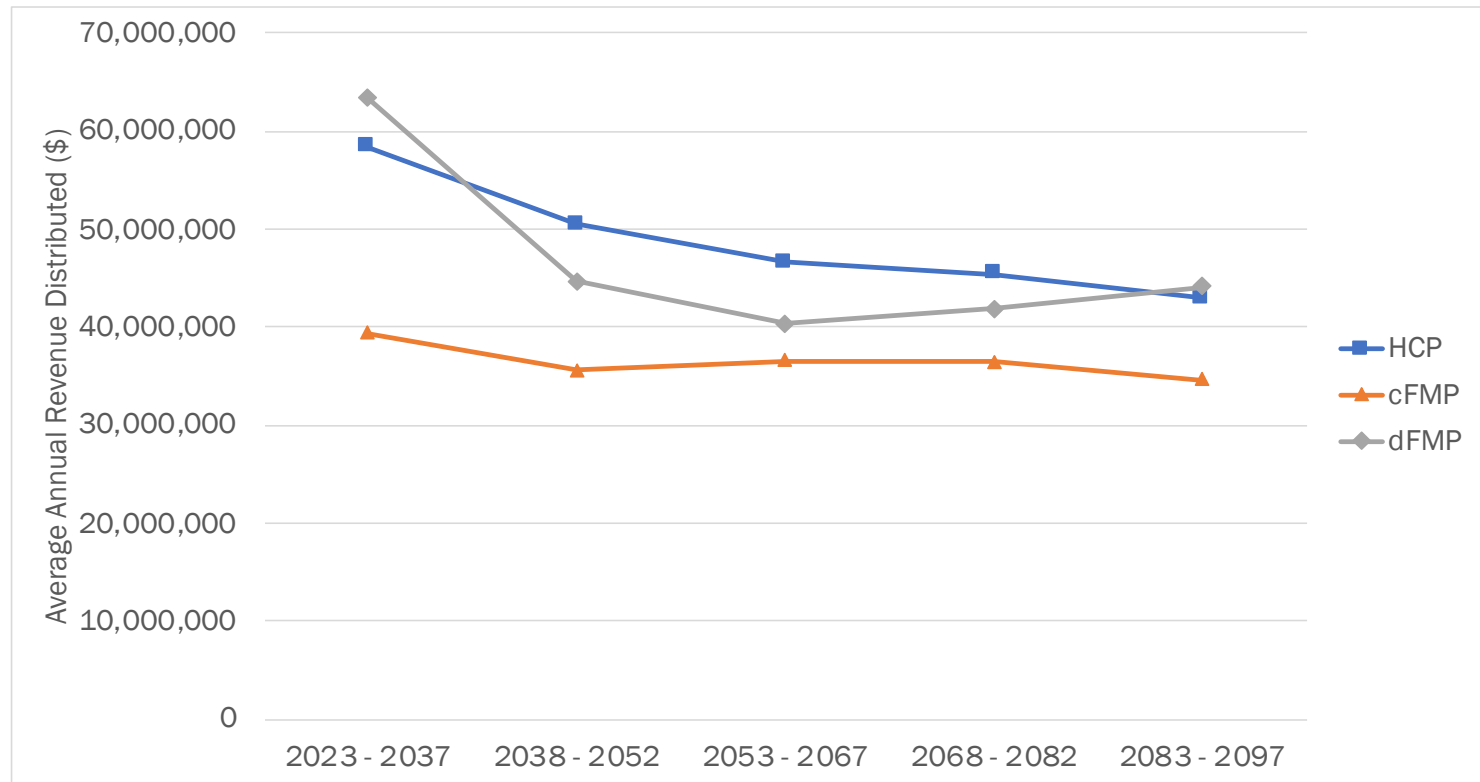
- HCP has the most annual harvest volume (225 mmbf)
- Least under cFMP (175 mmbf)

Annual Average Harvest Revenue



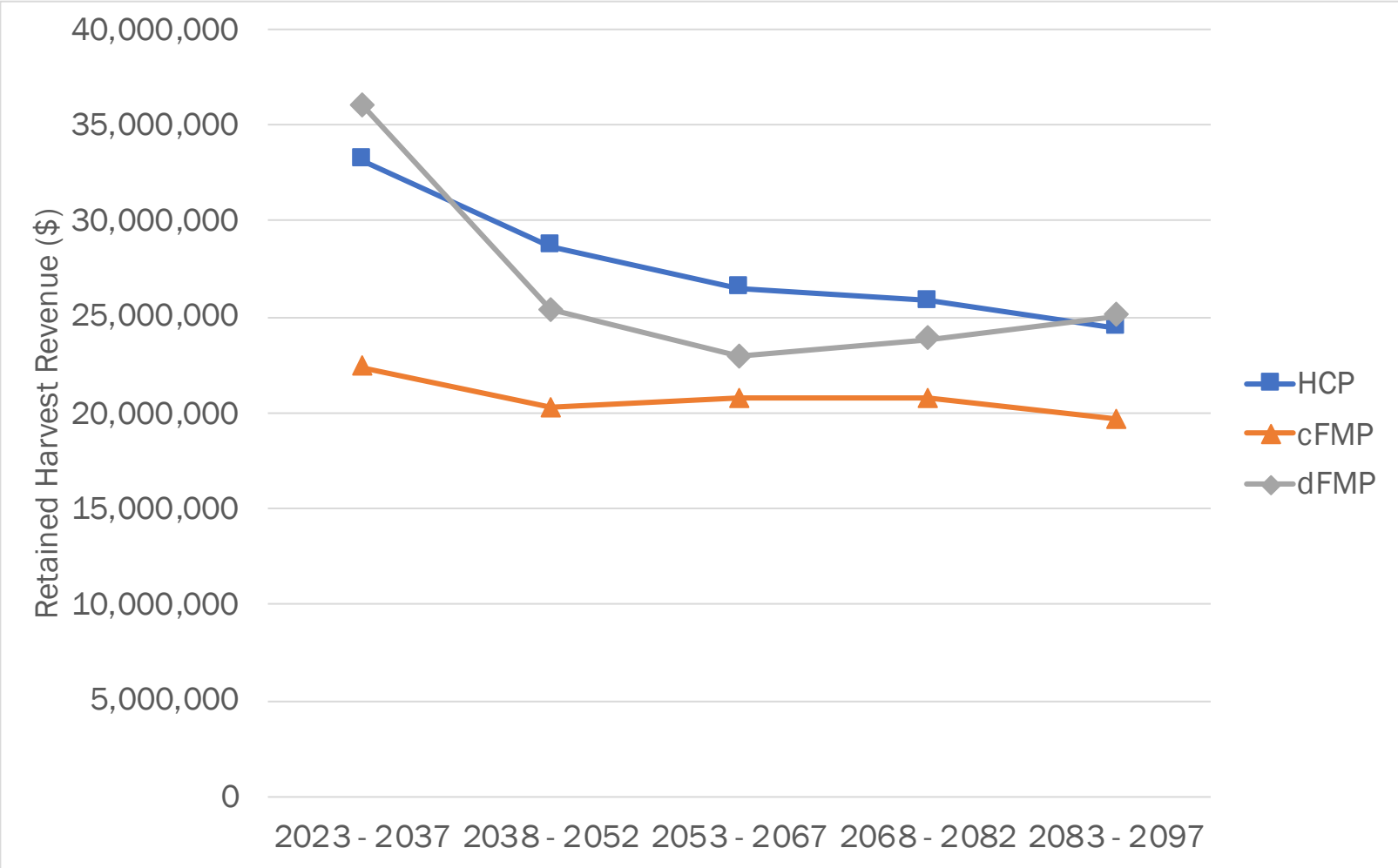
- Harvest revenue (after harvest costs) is greatest with the HCP
- Least with cFMP

Revenue Distributed to Counties



- HCP provides the most distributed revenue (\$3.7 billion)
- cFMP provides the least distributed revenue (\$2.7 billion)

ODF Retained Harvest Revenue



ESA-Related Costs

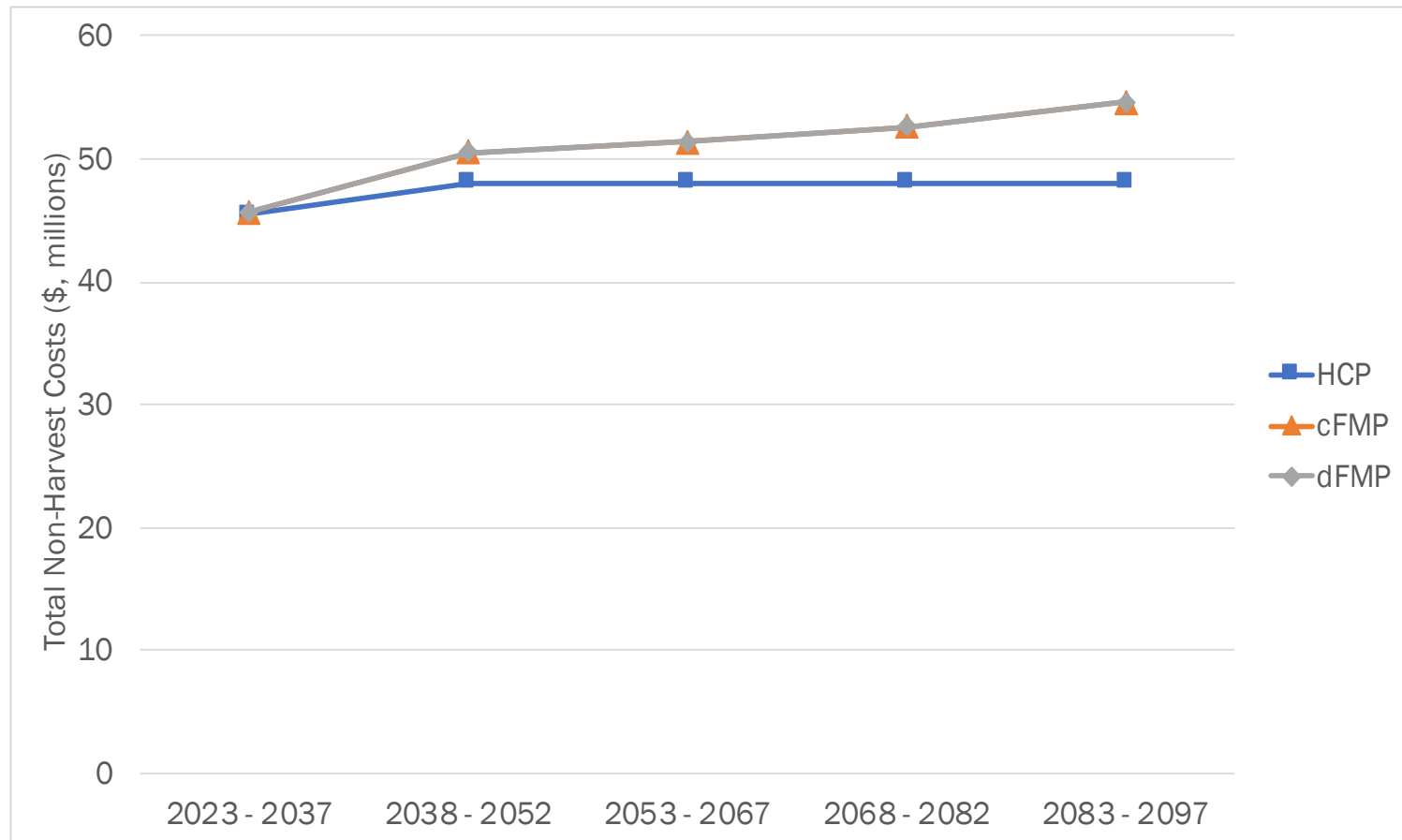
Table 1. Average Annual ESA Compliance Costs for ODF by Scenario

Cost Category	cFMP and dFMP	HCP	Annual HCP Cost Savings
ESA Administration	\$3,165,000	\$348,000	\$2,816,000
Species Management ^a	\$4,216,000	\$3,095,000	\$1,121,000
Total	\$7,381,000	\$3,444,000	\$3,937,000

Notes: ^a Assumes new species listing would result in over \$1.7 million of additional annual survey costs for cFMP and dFMP. Some totals affected by rounding.

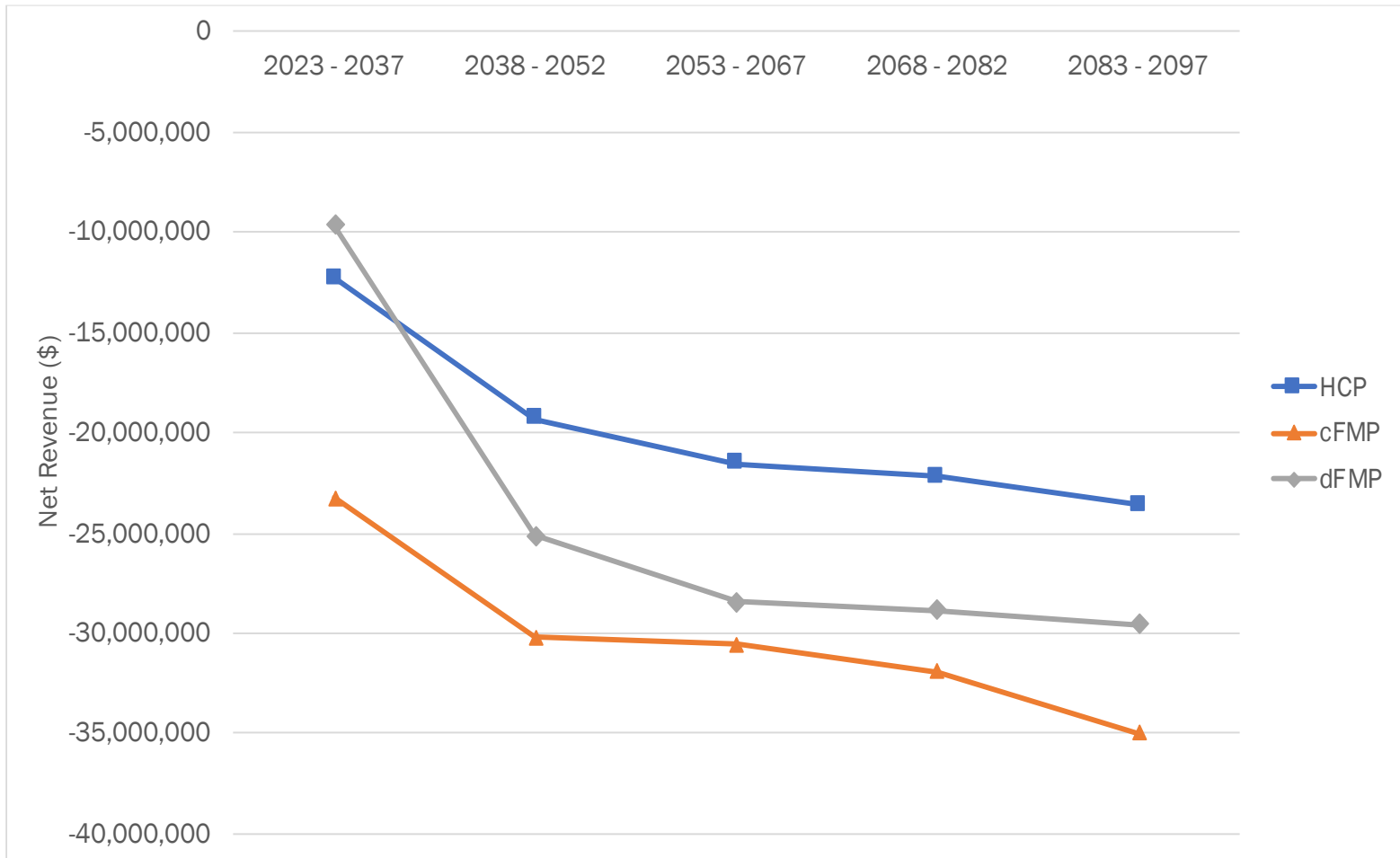
- ESA-related costs are lowest with the HCP, providing \$ millions in annual savings
- ESA spending under the HCP would be productive (beneficial) vs. compliance-only
- Survey costs increase under cFMP/dFMP
- ESA admin costs increase under cFMP/dFMP

Non-Harvest Costs



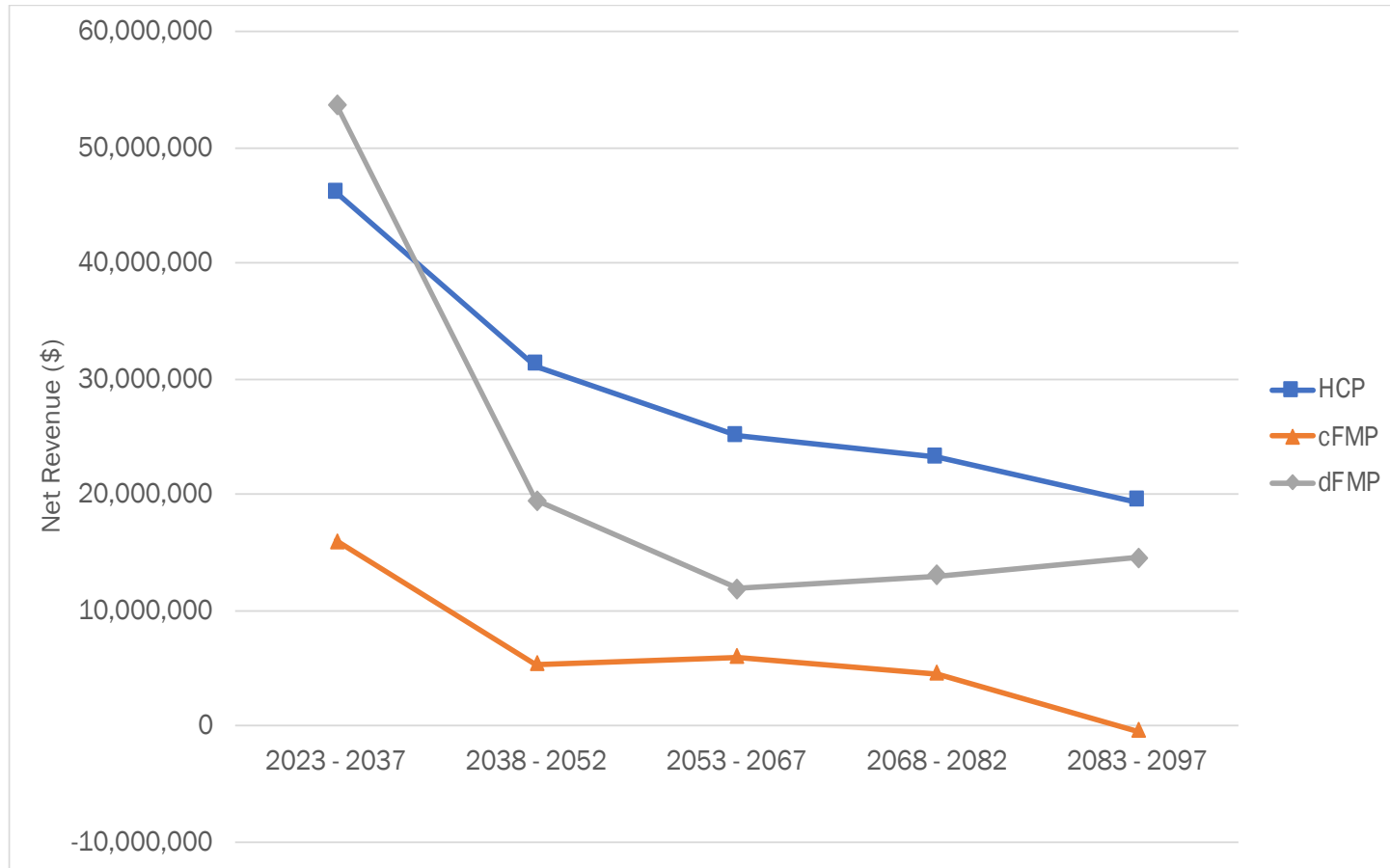
- dFMP and cFMP have similar expected non-harvest costs
- Costs increase for all scenarios for the first 10 years due to staff admin
- cFMP/dFMP Survey costs increase after 10 years, ESA admin costs continue up

Net Operating Income (After County Payments)



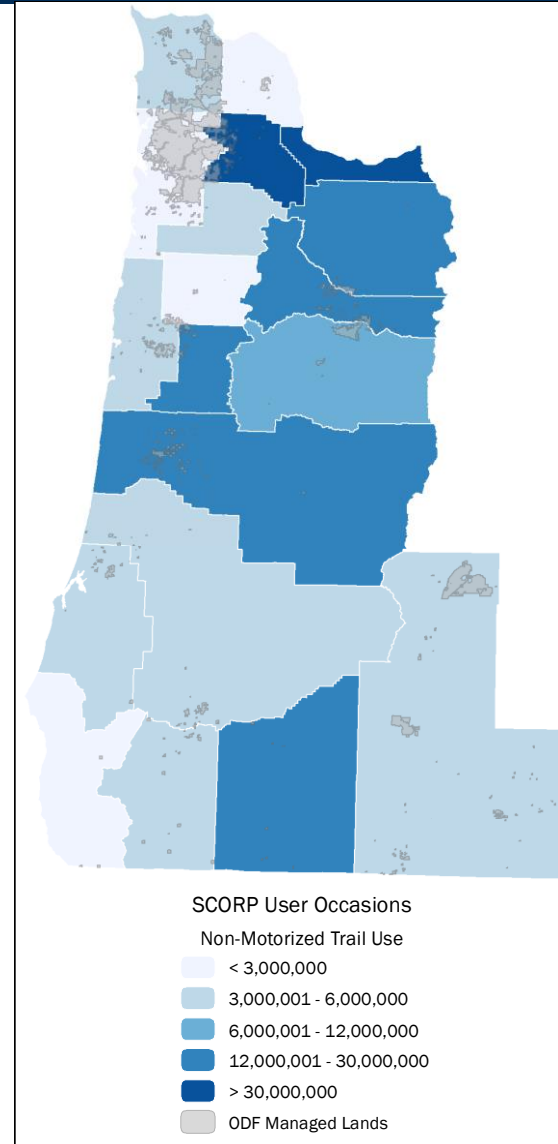
- HCP provides the most favorable net operating income
- cFMP provides the least favorable

Net Revenue (w/out County Payments)

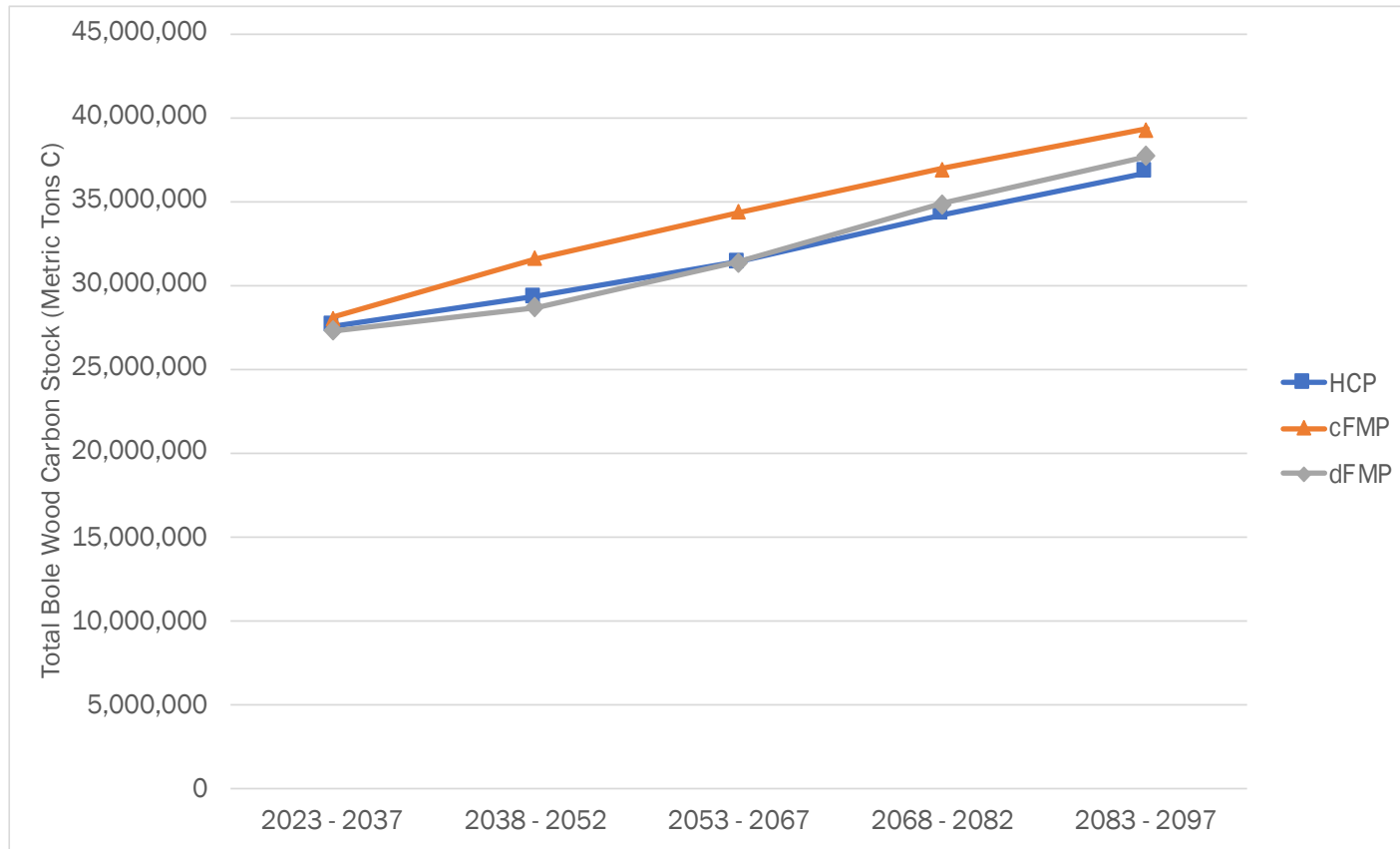


- HCP provides the most net revenue
- cFMP provides the least net revenue

- **Carbon** – storage increasing across all scenarios
- **Recreation** – no major differences across scenarios, more reliable funding and investment context with HCP
- **Cultural** - no major differences across scenarios, more reliable protections and investment context with HCP



Carbon Stock Volume



Carbon stock increases for all scenarios
Highest stock with cFMP (lowest harvest volume)

Risk Management Benefits of HCP

Risk Management Outcome	Rationale
<i>Reduced habitat risk</i>	Long-term commitments to habitat protection for covered species
<i>Reduced timber harvest risk</i>	Certainty of encumbrances from currently listed species and new species listings
<i>Reduced litigation risk</i>	Defined conservation commitments as well as timber management commitments
<i>Reduced timber market vulnerability</i>	Improved timber sale process to better time market and capture high market prices
<i>Reduced disturbance event vulnerability</i>	More resilient and connected habitat conditions for storms, wildfires, and other disturbances
<i>Reduced outdoor recreation investment vulnerability</i>	More predictable long-term land use designations provide a more predictable setting to plan and implement outdoor recreation investments such as facilities and trails.

- HCP functions as an insurance policy across all categories of value provided by state forests

Final Scenario Rankings

		cFMP	dFMP	HCP
Conservation	Covered Terrestrial Species Habitat Quality	High	Low	Medium
	Covered Aquatic Species Habitat Quality	Tied	Tied	High
	Quantity and Quality of Monitoring	Low	Medium	High
Economic	Acres Available for Harvest	Low	Medium	High
	Annual Harvest Volume	Low	Medium	High
	ODF Costs	Low	Medium	High
	Net Revenue	Low	Medium	High
Social	Carbon Storage	High	Tied	Tied
	Recreation and Culture	Low	Medium	High

- HCP provides the most overall benefit across all categories of analysis
- cFMP is strong on conservation variables
- dFMP is strong on harvest/economic variables
- In several cases, two scenarios have very similar outcomes
- Recreation and Culture outcomes qualitative, minor differences

- The **HCP Scenario** generates the **greatest total harvest volume** over the 75-year timeframe.
- ODF's **costs are lowest** under the **HCP Scenario**.
- **Net revenue is greatest** for the **HCP Scenario**, followed by the dFMP and finally the cFMP.
- The **HCP Scenario** would result in the **protection and stewardship of more suitable habitat for covered species** within areas designated for conservation relative to the cFMP and dFMP.
- The **cFMP and HCP both have strong conservation outcomes for terrestrial species**. The cFMP results in development of more suitable habitat for covered species in the entire permit area.

Key Findings (cont.)

- **HCP conservation areas** protect **larger, less fragmented** occupied and suitable habitat for covered species.
- **Aquatic strategies for all three scenarios are strong;** however the HCP provides the best potential outcomes.
- **Carbon sequestration is highest under the cFMP,** due to anticipated reductions in harvest levels over time.
- **All management scenarios** provide benefits for **recreation opportunities and culturally-significant uses.** However, the funding stability afforded by the HCP provides more opportunity for investment.

Western Oregon HCP Staff Recommendation

Direct staff to finalize the administrative draft HCP and complete the NEPA process.



Next Steps

- Continue work with the Scoping Team & Steering Committee to complete administrative draft HCP
- Begin development of Companion FMP
- NEPA process to begin in spring 2021
- HCP/ Companion FMP update to Board in June 2021
- Final HCP and Companion FMP to the Board in June 2022

Next Steps



Western Oregon State Forests HCP

More Information

<https://www.oregon.gov/ODF/AboutODF/Pages/HCP-initiative.aspx>

Contact

Cindy Kolomechuk,
cindy.kolomechuk@oregon.gov,
503-502-5599

Thank You!

Submitted: October 2, 2020

RE: Habitat Conservation Plan for Tillamook and Clatsop state forests

Chairman Imeson and members of the Board:

Thank you for this opportunity to comment. I am grateful that the Board of Forestry is moving quickly on a Habitat Conservation Plan for the Tillamook and Clatsop state forests.

After serving three terms on the Northwest Regional Forest Practices Committee, I have great respect for the high level of scientific expertise and solid integrity of our ODF staff. I strongly support the adoption of the staff-recommended HCP.

We have long been accustomed to thinking of our forests as renewable resources, While that may still be true for timber, as climate change accelerates faster than we imagined, it is not true for the bigger, older trees needed for habitat. These trees when cut and replanted will never get as old or big in the same places they are now growing. Habitat lost now is irreplaceable.

Endangered and threatened species of bird, fish, mammal and amphibian, and even bugs and plants, are important not just for themselves, but tell us that ecosystems are threatened and endangered, ecosystems important in more ways than as habitats for these species. We need to think of the greatest public value for our public lands, as healthy ecosystems providing abundant cold water, mitigating the effects of climate change on local ambient temperature and rainfall, providing opportunities for recreation in quiet and beauty. Timber harvest provides short term dollars, but takes a great toll on the other, longer term public values of our forests, values of heightened importance as climate change progresses.

Our ODF staff has worked hard to produce a balanced Habitat Conservation Plan. I hope you will vote to adopt it.

Thank you,
Candace Bonner, MD, MPH
Member, Northwest Regional Forest Practices Committee.
candace.bonner@gmail.com



October 6, 2020

Oregon Board of Forestry
2600 State St.
Salem, OR 97310 VIA [EMAIL: BoardofForestry@oregon.gov](mailto:BoardofForestry@oregon.gov)

Subject: Habitat Conservation Plan Draft -- State Forests

Dear Board of Forestry Members,

I am writing to express our opposition to the conservation measures and modeled outcomes for the proposed habitat conservation plan (HCP) for western Oregon state forests.

These comments are provided on behalf of the 1,000+ Associated Oregon Loggers (AOL) member companies and working families, representing harvest, logging, transportation, construction, reforestation, improvement, protection, and allied forest management businesses working in Oregon. AOL member companies are the working families and forest professionals who provide services to manage public and private forestlands on a contract basis, including Northwest Oregon's state forests. These companies may also purchase state forest timber-sale contracts. The revision of the forest plan and proposed habitat conservation plan are of critical concern to our work today and tomorrow.

The forest working families for whom we speak today number approximately 23,000 at work statewide. The scope of effect of State Forests spans well beyond Northwest Oregon; as contractors who manage state forestlands often travel from across all Western Oregon. The forest trade contractors are not takers, rather they are givers. They are the producers of the economic and societal livelihoods within rural Oregon.

For every 80 million board feet of sawlog harvested, forest working families generate 880 direct family jobs, or 1760 total direct, induced and indirect jobs. The marginal difference of 80 or 100 million board feet of annual harvest volume within the Board's state forest decision-making equates to hundreds of people's livelihoods. Forest working families pay Oregon income taxes and their activities contribute billions of dollars to Oregon's economy at-large. The HCP evaluation and proposal neglects these economic and social factors—and by definition this HCP omission distorts the fair assessment of Greatest Permanent Value from state forestlands.

- ✓ ***We oppose the Department's proposal to proceed with Habitat Conservation Plan (HCP) evaluation.***
- ✓ ***Rather we urge you to pause the process—to redress the many omissions in economic, social and harvest modelling inputs.***
- ✓ ***Furthermore, please pause your process to reconsider the misguided proposal to allocate excessive reserve acreage that far exceeds the reserve acre percentages of comparable HCPs in Western Oregon and Washington.***

Through this HCP proposal...Why is the State opening a battle with rural Oregon forest working families? This HCP proposal is a direct attack on those forest working families and trustland forest communities for whom our Oregon quality of life and the Oregon Way has evolved

If our forest working families and trustland forest communities have been doing such a bad job at managing forests these past fifty years, why are there so many precious forest ecosystems today that some would argue warrant reservation for their special attributes?

Our opposition is not about logging more timber volume. Our concern is about lacking trust. We are losing trust in the Board and Department to equitably balance active forest management's economic and societal benefits with an evasive menu of environmental wants. The latest HCP proposal is another disappointing trust-breaker in a series of State Forest management encumbrances and broken economic agreements that began in 2001. We cannot trust the promised outcomes of the HCP—and this will erode our investment in future professional forestry here.

I concur with those remarks today made by the Council of Forest Trust Land Counties, as well as those representing Oregon Forest & Industries Council, and other professional forest management organizations.

This HCP proposal is not acceptable. Forest working families reject your proposal to proceed.

In closing, I urge the Board's rejection of the HCP proposal. Thank you for your consideration.

Respectfully as forest stewards,

Rex Storm

Rex Storm, Certified Forester
Executive Vice President
Associated Oregon Loggers, Inc.

Written Comments to the Oregon Board of Forestry

I would like to begin first by saying, “Thank you” to ODF staff for what we see as an increased openness and willingness to share information and provide opportunities for communication on important issues. In light of the incredible challenges Covid-19 and an historic fire season have leveled against them, we believe their efforts deserves recognition and appreciation. Previously, conservation groups have demonstrated a profound lack of trust in the Oregon Department of Forestry for a lack of transparency and accountability. This has been pointed out in recent OBF meetings. Our chapters think it only fair then to acknowledge efforts by staff to provide greater access to information and we look forward to what we hope is continuing improvement in our ability to work together.

To the question at hand, we support Oregon Department of Forestry’s staff recommendation to continue with its work to develop a Habitat Conservation Plan (HCP) for state forests and to move forward to the National Environmental Policy Act (NEPA) process. We believe the HCP as presented is a decent, respectful, scientifically sound, and economically feasible attempt to address our concerns for threatened and endangered species. We view this as an admirable compromise between conservation concerns and revenue generation. To us, this is the essence of what it takes to meet the goal of providing for the “greatest permanent value” of our public lands. We ask the Oregon Board of Forestry to vote “yes.”

We are pleased to note that the Riparian Conservation Areas (RCA) are to be measured horizontally and that all Type F streams will receive 120 ft buffers. We believe a 120 no-cut buffer can improve water quality with regard to moving us closer to meeting the cold water criteria. We expect that with careful monitoring and some judicious restoration work that these buffers will provide adequate downed wood to these streams. We also applaud the inclusion of adjacent wetlands, seeps and springs, and side channels in these protections. While we still have questions about the attention (or lack thereof) to water temperatures in Type N tributaries and some serious concerns about the lack of specificity in the language pertaining to road construction and maintenance, we view the proposal as a major step forward in efforts to protect and conserve threatened and endangered aquatic species.

We are also satisfied that Habitat Conservation Areas (HCA) when combined with the RCA’s will make up nearly 50% of the permit area. We think this is again a reasonable compromise in support of “greatest permanent value.” We applaud ODF staff in their attempts to draw HCA boundaries that are for the most part large enough to protect from “edge effects” that degrade habitat quality. We also feel that adopting a much wider plan area provides much needed flexibility considering the length of the permit term. We are also satisfied that staff has attempted to leverage habitat acreage by considering ownership of lands adjacent to smaller HCA tracts.

While we continue to disagree strongly with the industrialized logging practices including clear cuts, logging on steep slopes, and aerial spraying of herbicides, we recognize that changes to this kind of regime must be taken up in another venue. With these kinds of practices as the accepted norm the lack of specifics on what exactly active management activities will look like inside the HCAs concerns us a great deal. However, in light of ODF's improving willingness to provide information and answers, we are for the moment content to accept their assurances that revenue generation will not be the driver for these activities. Inclusion of the \$5 per thousand set aside into a conservation fund is also encouraging and lends some credence to assurances that the Department can and will seek to engage in meaningful habitat improvement projects over the term of the permit. Until we see large scale examples to the contrary we remain skeptical that the Department has the background and experience to use active management practices to "grow better habitat" for the targeted terrestrial species. In particular we wish more attention were being paid to canopy closure in Marbled murrelet nesting habitat and hope this lack will be addressed during the NEPA process.

In summary we believe the HCP has considerable merit and is worthy of the Board's support. Please vote "yes" to move forward into the NEPA process.

Respectfully,

Joseph Youren

Audubon Society of Lincoln City

Salem Audubon Society



Date: October 3, 2020
From: Audubon Society of Portland
To: Board of Forestry
Re: Western Oregon Forest Habitat Conservation Plan Decision

Dear Members of the Board of Forestry

I am writing on behalf of the Audubon Society of Portland (Audubon) and our 17,000 members to urge the Board of Forestry to vote YES to advance work on the Western Oregon Forests Habitat Conservation Plan (HCP). Audubon supports the Oregon Department of Forestry (ODF) staff recommendation which concludes:

Based on the results of the Comparative Analysis, the letters of support from NOAA Fisheries (Attachment 4), United States Fish and Wildlife Service (Attachment 5), and the Steering Committee (Attachment 6), the Department recommends the Board of Forestry direct staff to finalize the administrative draft HCP and move into the NEPA Process.

The HCP covers more than 639,000 acres including the Tillamook and Clatsop State Forests. Audubon has been engaged for decades in promoting sustainable conservation strategies on the Tillamook and Clatsop. These forests provide a wide array of important ecosystem services including habitat for threatened and endangered species, including salmon, steelhead, Marbled Murrelets and Northern Spotted Owls, sequestering carbon and cleaning our water. They also provide important recreational opportunities and support our economy through timber harvest and recreation-based spending. However, the management of these forests has for decades been mired in conflict, litigation and unpredictability. It is time to move forward into a new era that provides real protection for imperiled species, predictability for stakeholders and moves these forests toward ecological health.

We believe that an HCP is the right path forward to achieve these goals. While we are still in the process of analyzing the draft HCP, we have had the opportunity to participate in various stakeholder meetings, attend public information session and conduct a preliminary review of the materials released in recent weeks. We are generally impressed with the work done to date and believe that the nearly two years of effort that have already been invested in this process merit a vote of confidence by the Board of Forestry at the October 6th meeting. We are enthusiastic about the dedication of approximately 50% of the area covered by the HCP into Habitat Conservation Areas (HCAs) and/or Riparian Conservation Areas (RCAs), an approach which we believe will provide the most durable long-term benefits for the 16 imperiled species covered by the plan.

We would note also that there is no “plan B.” A return to the status quo would simply perpetuate an era of conflict, unsustainable and unpredictable harvest regimes and degradation of fish and wildlife habitat, water quality and other natural resource values. The State’s current “take avoidance” strategy for listed species is expensive, costing approximately \$2.5 million/ year, ineffective for promoting the recovery of the species it is ostensibly supposed to protect and leaves the State vulnerable to future litigation.

While we are generally supportive of this plan, we would note that that there are areas that we believe need further consideration including the status of older stands outside of the RCAs and HCAs. We look forward to working with ODF on further refinement of the plan in the coming months. We appreciate the work that has been done to date and urge the BOF to vote yes to move this plan forward toward.

Thank you for your consideration of these comments.

Respectfully,

A handwritten signature in black ink that reads "Bob Sallinger". The signature is written in a cursive, slightly slanted style.

Bob Sallinger
Conservation Director
Audubon Society of Portland



October 2, 2020

Oregon Board of Forestry
2600 State Street
Salem, Oregon 97310
(503) 945-7210
BoardofForestry@oregon.gov

Re: Western Oregon Habitat Conservation Plan Support

To the Oregon Board of Forestry:

Cascadia Wildlands and our 10,000 members and supporters urge the Board to move forward with securing a Habitat Conservation Plan for its western Oregon forestlands.

Cascadia Wildlands educates, agitates, and inspires a movement to protect and restore Cascadia's wild ecosystems. We envision vast old-growth forests, rivers full of wild salmon, wolves howling in the backcountry, and vibrant communities sustained by the unique landscapes of the Cascadia bioregion.

Our organization believes that while the discussions around the Habitat Conservation Plan have been productive, and there is a viable way forward with all stakeholder buy-in. While the draft plan is less than perfect, and one in our opinion, over-prioritizes commercial timber harvest, we believe there is a net conservation benefit for wild places, imperiled species, and our rural communities. Our organization will continue to work with the Department of Forestry that has done a noble job of presenting and disseminating information given current restraints.

Given the large numbers of federally listed species throughout state forests in western Oregon, securing a Habitat Conservation Plan is the only realistic way forward for the Board.

Thank you for your consideration.

Sincerely,

Nick Cady
Cascadia Wildlands



PO Box 611
Coos Bay, OR 97420
coastrangeforestwatch@gmail.com
www.coastrangeforestwatch.org

To: The Oregon Board of Forestry

Regarding: HCP Board Decision

Dear members of the Board of Forestry,

Coast Range Forest Watch is an all-volunteer non-profit organization that has been working in southwest Oregon since 2013 to advocate for conservation of native forests and the species and communities that depend on them. We have been involved in both public and stakeholder meetings held by the Oregon Department of Forestry from the early stages of the Western Oregon Habitat Conservation Plan planning process. We support a decision by the Board that moves to continue with the HCP process.

It has been evident throughout this process that ODF has worked hard to incorporate the best available information and balance multiple objectives. We recognize that the HCP is a compromise, seeking to achieve maximum economic benefits and harvest stability while providing habitat protections that are sustainable for endangered species.

We cannot at this time say that we fully support the HCP, as there is still much more work to be done on identifying clear conservation metrics that can correspond to a monitoring plan. These metrics will be critical to determine if the plan is accomplishing the conservation goals, and to inform adaptive management strategies if the plan does not produce the expected conservation outcomes. Specifically, the best available science on coho salmon needs to be incorporated to determine if the size of stream buffers is adequate, as well as clear harvest restrictions within the Habitat Conservation Areas that will ensure the protection of Marbled Murrelet and Northern Spotted Owl nesting habitat into the future. We recognize the importance of an accompanying forest management plan that will be in line with the conservation goals of the HCP.

While there is much left to be completed on this HCP, we believe this process has put ODF on track to provide more stability for accomplishing conservation goals that will result in better quality habitat on Western Oregon's State Forests in the future. We believe this effort is a potential pathway for these forestlands to provide the greatest permanent value to Oregonians, and urge you to vote for ODF to continue work on this plan.

Thank you,

Teresa Bird

Co-director, Coast Range Forest Watch



ATTN: Oregon Forestry Board
emailed to: BoardofForestry@oregon.gov

October 1, 2020

SUBJECT: SUPPORT FOR THE STATE FOREST HABITAT CONSERVATION PLAN

Dear Members of the Oregon Board Forestry:

Please vote to advance the State Forest Habitat Conservation Plan (HCP) process forward. The HCP is a compromise that helps secure more concrete and durable protections for state forest lands while providing the forest industry with reliable harvest opportunities. The HCP puts our state forests on a path to balanced, sustainable, and science-based management. I urge you to vote yes and continue with the planning process.

Oregon's state forests provide many values including fish and wildlife habitat, recreation, clean water, climate mitigation and timber harvest. It is a challenge to balance these values and will become more so as climate change effects intensify. Therefore, it is critical to support a balanced plan that conserves our natural resources for the future while also providing a mix of benefits for today.

Thank you for consideration of my comments.

Sincerely,

Shaun Pigott

Shaun Pigott, President

Deschutes Redbands Chapter – Trout Unlimited
16 NW Kansas Ave. Bend, OR. 97703

Darlene Chirman
Great Old Broads for Wilderness,
Cascade Volcanoes Chapter
7017 SE Martins Street
Portland OR 97206
805-455-3541



October 1, 2020

Board of Forestry
boardofforestry@oregon.gov

RE: Western Oregon State Forest Habitat Conservation Plan

The Great Old Broads for Wilderness is a stewardship and advocacy group that promotes forest health. We are pleased to comment on the proposed Habitat Conservation Plan (HCP) for the Western Oregon State Forests, and urge the board to move forward with the process, finalizing the draft HCP, and initiating the NEPA environmental review. In reviewing the draft HCP, it appears that the Plan will provide better long-term protection for the covered species that are listed or candidates for listing under the federal Endangered Species Act.

We also support the HCP in that it will provide more operational certainty for the Oregon Department of Forestry in planning timber harvests. The HCP sets aside Habitat Conservation Areas (HCAs) for terrestrial species and Riparian Conservation Areas (RCAs) for aquatic species, and many of these conservation areas are larger blocks than the current forest management provides. This reduces habitat fragmentation for wildlife, and also provides for simpler planning for timber harvests. The funds currently spent on wildlife surveys and endangered species management for endangered species will be reduced, and funds can be more effectively utilized to maintain and recover endangered species, utilizing the Conservation Fund to be established with the Habitat Conservation Plan.

Several of the covered species, the Northern Spotted Owl, Marbled Murrelet and Red Tree Vole, are dependent on old growth forests. Thus areas designated for the HCAs include most of the old growth stands within the permit area, and retention of older, larger trees will be incorporated in harvest plans. Thus we anticipate that carbon storage will increase during the 70-year permit period of the HCP, which we strongly support. Older trees are more resistant to fire, and thus will minimize tree loss in future wildfires. With climate change changing temperature and precipitation patterns, this will be beneficial. Management of the HCA's will enhance development of more suitable habitat for these species.

The Riparian Conservation Areas will provide buffers of 120 feet for all fish-bearing streams within the permit area, and will increase woody debris over time. Studies demonstrate a deficit of woody debris, probably due to historical logging practices. Addressing the fish passage barriers will be an important improvement of the HCP. While 284 fish passage improvements have been made by ODF in the past 23 years (1995-2018), there remain 169 impassable and 93 partial barriers in the permit area. The Plan will prioritize fish barrier removal projects with the greatest fish habitat benefit. Two aquatic salamander species will also be protected. The Plan will also evaluate the road system, and repair, relocate or abandon road segments that cause sedimentation of the streams, prioritizing fish-bearing streams.

In summary, we support moving forward with the Habitat Conservation Plan, and urge you to vote yes on October 6 to move forward with finalizing the Plan and initiating the NEPA environmental review. We look forward to commenting on the Plan at future stages of the process.

Sincerely,

Darlene Chirman
M.S. Ecology, University of California at Davis



October 1, 2020

Mr. Tom Imeson, Chair
Board of Forestry
2600 State St
Salem, OR 97310

Subject: Public Comment on the draft Western Oregon Habitat Conservation Plan (HCP)
Board Decision

Dear Chairman Imeson and Members of the Board:

The Joint Water Commission (JWC) is the primary drinking water supplier for over 400,000 people in Washington County, Oregon. The JWC is made up of four member agencies: the Cities of Hillsboro, Forest Grove, Beaverton, and the Tualatin Valley Water District (TVWD). The JWC water supply comes from two surface water sources: the Tualatin River including its tributaries Sain Creek and Scoggins Creek, and the Middle Fork of the North Fork of the Trask River. In addition to diverting water directly from these sources, in the summer months the JWC uses water from storage supplies in Barney Reservoir, on the Middle Fork of the North Fork of the Trask River, and Scoggins Reservoir (Hagg Lake) on Scoggins Creek, a tributary of the Tualatin River. The JWC obtains water from the Tualatin River through the Spring Hill Intake south of Forest Grove.

Thank you for the opportunity to comment on the draft Western Oregon Habitat Conservation Plan (HCP). The JWC values our strong working relationship with the Forest Grove District that has supported in high-quality and reliable drinking water supplies for decades. We would like to continue that strong partnership in order to protect drinking water supplies for future generations by working together to address water quality impacts associated with land management activities.

Any management activity within the drinking water source area has the potential to affect water supplies. JWC's primary areas of concern with the proposed permit area are in the upper Trask River watershed, specifically around Barney Reservoir and the upper Tualatin River watershed, especially the Scoggins Creek drainage. These are sensitive and vital resources and the water quality in these areas impacts the JWC's ability to provide drinking water to our customers.

While the proposed HCP is primarily focused on compliance with the Endangered Species Act, the work on the ground will impact water resources. ODF goals of minimizing take of endangered species and providing financial security can be aligned with the preservation of water resources. One example is the proposed increase to riparian buffer widths compared to the current Forest Management Plan. Please consider these impacts when making land management decisions.

Please also consider supporting the following in order to help protect drinking water.

- Efforts to minimize fine sediment and nutrient loading associated with management activities.
- Appropriate equipment exclusion zones for streams to prevent soil disturbances and retain ground and understory vegetation.

General Manager

Niki Iverson
150 E. Main Street
Hillsboro, OR 97123
503-615-6585

Board of Commissioners

City of Hillsboro

John Godsey
David Judah
Deborah Raber

City of Forest Grove

Rod Fuiten
Carl Heisler
Peter Truax

City of Beaverton

Denny Doyle
Marc San Soucie
Mark Fagin

Tualatin Valley Water District

Dick Schmidt
Jim Doane
Bernice Bagnall



- Sufficient time delays between industrial harvests in drinking water source areas to avoid abrupt landscape-scale changes in short periods of time.
- Adding Habitat Conservation Areas within the drinking water source areas, where possible.
- Include drinking water supplies as an economic and social benefit in the review of the Greatest Permanent Value.
- Include a drinking water stakeholder in the development of the HCP and companion forest management plan to ensure protection of the region's drinking water supplies.

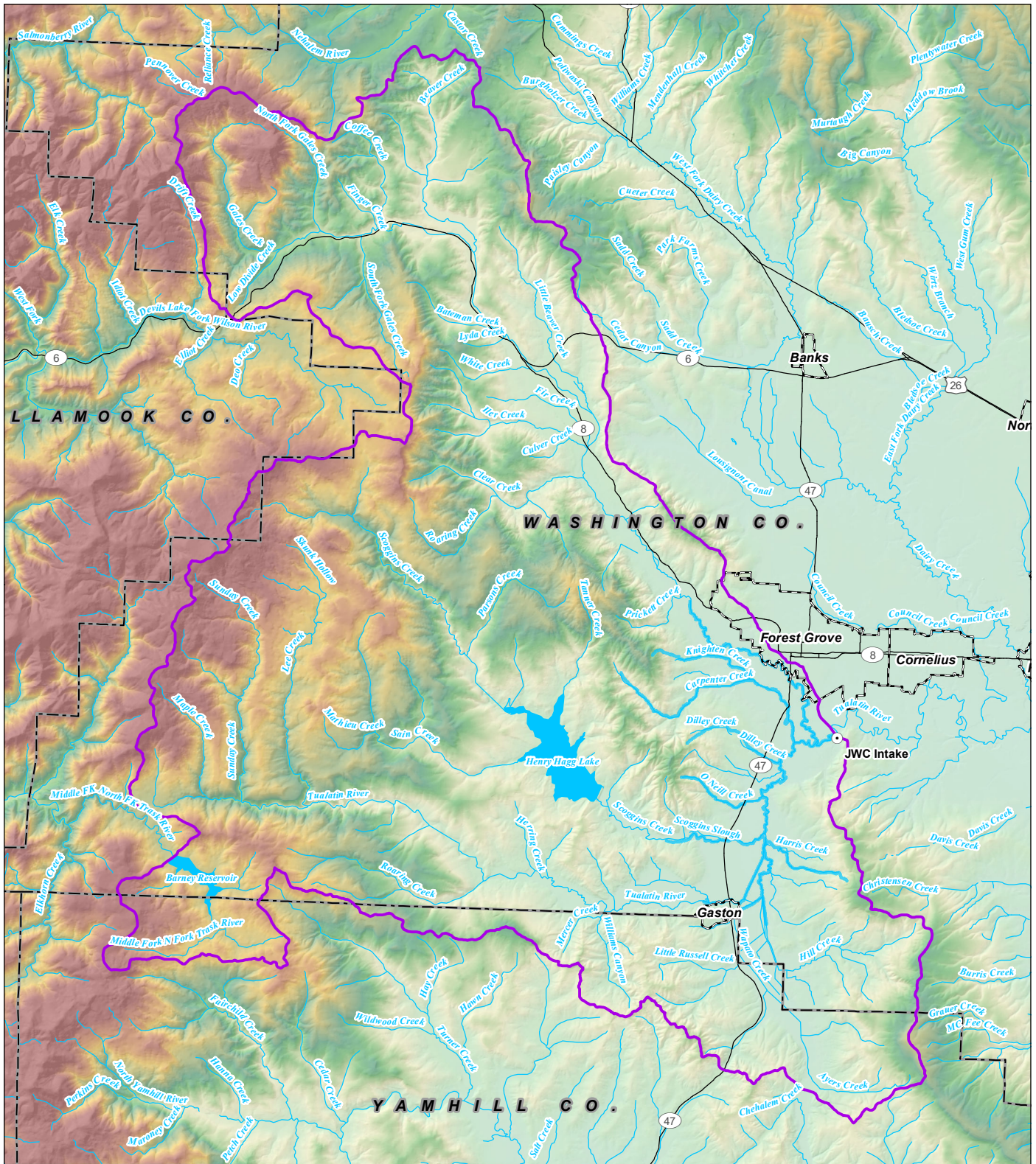
The JWC seeks to work with partners to help mitigate the stressors to water resources in the decades to come. We look forward to continuing our partnership and working with the exemplary ODF staff through this process. Thank you for the considerations.

Sincerely,



Jessica Dorsey
Senior Program Manager, Water Resources
Joint Water Commission
150 E. Main Street
Hillsboro, OR 97123

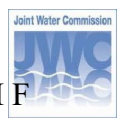
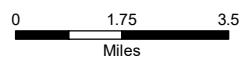
Attached: Map of the Joint Water Commission's Drinking Water Source Area



**Joint Water Commission's
Drinking Water Source Area (DWSA)**

LEGEND

- JWC Intake
- Counties
- ~ Waterbodies
- ⊕ Cities
- ⚡ 8 hr Time of Travel
- ⚡ Highways
- DWSA



MAP NOTES:
 Date: August 8, 2013
 Data Sources: FEMA, ODF FACTS, USDA, USDA NRCS, DOGAMI, The Wetlands Conservancy,
 METRO RLIS, Yamhill Co, City of Hillsboro, OR DEQ, ODOT, USGS, ESRI

AGENDA ITEM F



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Adventure Travel

527 SE 43rd Avenue
Portland, Oregon 97215
T: 503-227-2345
F: 503-227-0862
E: adventure@mazamas.org
mazamas.org

October 1, 2020

Oregon Board of Forestry

**RE: State Forest Habitat Conservation Plan (SFHCP) for
Western Oregon**

On behalf of the 3,500 members of the Mazamas, I am writing to encourage the Committee's support and passage of the State Forest Habitat Conservation Plan (SFHCP) for Western Oregon.

The Mazamas was formed on the summit of Mt. Hood on July 19, 1894, and for more than 125 years the Mazamas have been a part of Oregon's history. We have been leaders in exploration, recreation, and conservation within the Pacific Northwest and farther afield. Our members have played a part in land protection since our inception, including areas in Forest Park, Mt. Hood National Forest, and others.

Our members not only use trails, but we help maintain and build trails. Some of our "home" trails are within the SFHCP. The Mazamas adopted the Kings and Elk Mountain trails a number of years ago, along with the adventurous trail that leads between the two peaks. Our members built the summit registers that are atop both peaks, and we archive and maintain those registers to this day.

At the Mazamas we feel the urgency of climate change, and know that to continue to be good stewards of our great state we must act now to protect and conserve the areas named in this Conservation Plan. This SFHCP is a compromise that balances timber harvest with recreation, fish and wildlife habitat, clean water, and climate migration. Good stewardship of our lands and our climate requires strong and decisive action from us all to ensure that these beautiful spaces will be here for generations to come for continued recreation and exploration.

We are urging the committee to vote yes to advance this plan into the NEPA process and protect the 300,000 acres of forest land.

Sincerely,

Sarah Bradham
Mazamas Acting Executive Director



**SCHOOL
DISTRICT**

Preparing children for an ever changing world

504 N. Third Ave. / PO Box 28
Rockaway Beach, OR 97136

Phone: 503-355-2222

Fax: 503-355-3434

www.nknsd.org

Thursday, October 1, 2020

Oregon Board of Forestry
Oregon Department of Forestry
Salem Headquarters
2600 State Street
Salem, Oregon 97310

Members of the Board of Forestry:

As the Neah-Kah-Nie School District Superintendent, I appreciate the time you serve on the board and I value the opportunity to talk with you today. I understand the Oregon Board of Forestry's decisions have a direct impact on the level of education Neah-Kah-Nie School District can provide its students. I would like the Board to have the same understanding. In my brief presentation, I would like to share with you the unique history, and dependency on timber revenue, my school district has with the Tillamook State Forest.

Neah-Kah-Nie School District serves over 840 students from Bay City to Manzanita. The school district is recognized for its outstanding schools with well-maintained facilities, engaging curriculums, high quality professional development, and up-to-date technology. Neah-Kah-Nie is a fantastic school district that is greatly dependent on timber revenue.

Like many school districts in Forest Trust counties, Neah-Kah-Nie School District is reliant upon monies derived from timber sales on Forest Trust Lands. In fact, we are more dependent on timber revenue than the vast majority of 197 Oregon public school districts. Neah-Kah-Nie School District is one of four Oregon public school districts that does not receive State School Support. Neah-Kah-Nie School District receives its revenue from local funding including property taxes and timber revenue. Approximately 25% of our district's funding is sourced from timber sales on the Tillamook State Forest. Neah-Kah-Nie School District, 125 staff strong, is proof that local school funding works, we are excellent stewards of timber revenue.

The school district relies on timber funding to enhance educational opportunities for our students. While schools throughout the state are struggling with overcrowded classrooms and program cuts, our students enjoy manageable class sizes where they receive more personalized instruction.

The school district has built this strong foundation in large part due to funding from timber source lands. Quite frankly, timber revenue enhances student performance and improves the social/emotional health of our students. Neah-Kah-Nie High School is proud of the large increase in students interested in the natural resource field. In the near future, a team from Neah-Kah-Nie High School will compete in the Oregon Envirothon competition to promote conservation education of our natural resources. These high

school students recognize their education is influenced by the harvest of forest crops. They also prioritize the need for efficient environmental protections. Students understand a balanced approach to forest management is essential.

However, each year, with under-utilized timberlands and an uncertainty about funding levels, it is difficult for Neah-Kah-Nie school administrators, school board, and budget committee, to budget and plan long term for our students. When there is a consistent and sustainable timber harvest, the school district can budget accordingly. However, the high fluctuation of timber harvest makes it very difficult for long term planning, staff hiring, and developing and maintaining a sustained budget plan.

Essentially, for the Neah-Kah-Nie School District to provide a top tier education, we rely on a stable source of timber revenue. For the school district, a management plan that focuses on optimal revenue production, while also providing targeted and efficient environmental protections, is critical.

Under the current Forest Management Plan, in my opinion, the Oregon Department of Forestry is not maximizing timber harvest on Trust Lands, and that has been the case for more than twenty years, or since I have been a school administrator. Every year, excess volume is added to the growing standing inventory, at the expense of counties, communities, special districts, and school districts that are reliant on an equitable harvest rate and corresponding timber sales to fund critical services. I can only imagine the type of PreK-12 world class education I could offer students, if the Oregon Department of Forestry would reverse itself and increase timber harvest to optimal revenue production. Neah-Kah-Nie School District is not alone. Besides the 125 Neah-Kah-Nie School District employees and their families, entire communities throughout the state are in a similar situation: We look to this Board for action.

I strongly encourage the Board of Forestry to take steps to ensure an equitable management plan that will meet the social/financial needs of small, Oregon communities while also employing effective and efficient environmental protections. In doing so, this Board will help school districts like mine to continue to do its best for our students in the classroom while also ensuring that these students have beautiful, healthy forests in which to explore.

Thank you for your time and consideration.

Sincerely,

Paul Erlebach, Superintendent
Neah-Kah-Nie School District
paule@nknsd.org
503 355 3501



ASSOCIATION OF NORTHWEST STEELHEADERS

P.O. Box 55400 Portland, OR 97238
office@anws.org • (503) 653-4176

October 1, 2020

Dear Members of the Oregon Board of Forestry,

The Association of Northwest Steelheaders, one of the oldest conservation and sport fishing advocacy organizations in the Pacific Northwest, has been advocating for anadromous fish and their habitats since 1960. Our involvement in State Forest management recognizes the need for protection and restoration of the component of anadromous fish habitat that is related to public forests. We have repeatedly urged the Board of Forestry to consider entering into a Habitat Conservation Plan (HCP) as a way forward in providing more certainty around both habitat protection and timber production on State-owned forests.

The Association of Northwest Steelheaders strongly supports moving ahead with work on the State Forest Habitat Conservation Plan for Western Oregon. The plan is a compromise that seeks a balance among different and often competing interests. It would allow the focus to shift to management rather than conflict. We urge you to vote yes and continue with the planning process, moving it forward into the NEPA analysis.

We are encouraged to see that the draft HCP includes better stream buffers than those currently in place for most of the stream network, providing greater assurance of instream wood recruitment and water temperature protection. The draft HCP appears to provide significant conservation for the Wilson, Salmonberry, Nehalem, Miami, Trask, and Kilchis rivers, all considered potential salmon and steelhead strongholds.

Reduction of fine sediment delivery to streams is also anticipated as an outcome of the HCP, but practices and goals for this critical piece still need to be made explicit.

The comparative analysis document tells us that timber harvest levels will remain approximately the same under the HCP as under the current Forest Management Plan and a proposed future Forest Management Plan, while reducing the Department's operating costs and reducing the likelihood of future lawsuits.

Unlike either of the Forest Management Plans, however, an HCP will provide certainty around conservation: during the 70-year term of the HCP, Habitat Conservation Areas and Riparian Conservation Areas will be managed for their habitat values. The current plan has fluid conservation commitments, wherein areas designated as "Desired Future Condition-Complex" can be and have been changed and moved around to meet harvest goals without public input. At the same time, an HCP will

provide certainty around firmly designated timber production areas. There will be additional harvest strategies within the Habitat Conservation Areas, and much remains to be decided on what that will entail.

Your decision today is not to approve or disapprove the HCP; it is simply a decision to continue with the process of investigating the proposed HCP and send it on to begin the NEPA process. The proposed HCP clearly still needs work to solidify details, but at this point we do not see any reason to stop the process and fall back on the current situation, which has repeatedly proven inadequate.

Please vote to advance this plan and continue the process.

Thank you
Ian Fergusson
Association of Northwest Steelheaders



1320 Capitol Street NE, Suite 150
Salem, Oregon 97301
503-361-8941
orcattle.com

October 1, 2020

Oregon Department of Forestry
2600 State Street
Salem, OR 97310

Sent via Email: BoardofForestry@oregon.gov

RE: OCA Response to Draft Habitat Conservation Plan (HCP) for Western Oregon, State Forest Lands

To Whom it May Concern:

Thank you for this opportunity to offer comments concerning the Draft Habitat Conservation Plan for Western Oregon, State Forest Lands. For the record, please note the Oregon Cattlemen's Association position in opposition of the current proposed plan as drafted.

The OCA represents more than 1,000 cattle ranchers throughout Oregon. The Association is generally supportive of HCPs and has actively worked to implement and support HCPs that are inclusive and supportive of local economies and related natural resource industries along with threatened species.

It is the opinion of the Oregon Cattlemen's Association, the current proposed HCP, is based on setting aside timberland from a managed harvest regime to basically no harvest. This taking of almost 50% of Oregon's State Forest in the western region together with northwest Oregon will have a detrimental effect on the local economies and result in a financial and structural injury to the existing timber industry infrastructure. Cattle ranchers with small timber stands are injured financially if they are unable to manage their timber lands. The history of damage to industry and local economies due to no harvest set asides is real and the benefits to threatened or endangered species after almost 30 years of no management or harvest on approx. 4,000,000 million federally controlled acres in Oregon is now a contributing factor for multiple wildfires.

The HCP as proposed is unlikely to be embraced by local natural resource producers and it is doubtful the proposed HCP will benefit the intended species which it is designed to help. It is the opinion of the OCA these types of agency actions do little to appease those who represent non-agricultural interests who tend to pursue their agendas through endless legal challenges.

If I can be of further assistance to you in your efforts, please feel free to contact me.

Respectfully,

Tammy L. Dennee, CMP, CAE – Executive Director
Oregon Cattlemen's Association

~ Voice of the Oregon Cattle Industry Since 1913 ~



October 2, 2020

Via Email: BoardofForestry@Oregon.gov

Oregon Board of Forestry
2600 State St.
Salem, OR 97310

RE: HCP Board Decision (HCP)

Dear Chair Tom Imeson, State Forester Peter Daugherty and members of the Board,

On behalf of Oregon's manufacturers and large forestland owners, I offer this testimony regarding State Forests' Draft HCP proposal. The Oregon Forest & Industries Council (OFIC) is a statewide trade association representing forestland owners and forest products manufacturing companies in Oregon. OFIC's core mission is to advocate on behalf of its members to maintain a positive, stable business operating environment for Oregon's forest products community that fosters long-term investments in healthy forests; to ensure a reliable timber supply from Oregon's public and private forestlands; and to promote stewardship and sustainable management of forestlands that protect environmental values and maintain productive uses on all forestlands.

First, OFIC recognizes the potential benefits of managing under a programmatic HCP. I have asserted in previous testimony that these benefits are what compel many land managers to explore this option. The benefits are, however, only one side of the coin, and ultimately must outweigh the very real costs associated with these plans.

With that in mind, here are some concerns that we have:

A deeply flawed process

Over the last two years OFIC has attended several check-in meetings with ODF contractors and dozens of meetings with ODF staff where the primary agenda item was an overview of the process, with little to no substantive information discussed or shared. From the earliest stages we requested access to scoping team meetings and were denied. We've repeatedly asked for substantive information and were told it either wasn't available or staff wasn't at liberty to share it.

As I write these comments, only 11 days have passed since OFIC and all other stakeholders and county beneficiaries received the multiple pages of information on which we are being asked to comment – not nearly enough time to ground-truth information or fully digest the implications, even for forestry experts. We have several questions regarding the comparative analysis and would like to understand the assumptions and have real opportunities to discuss potential alternatives that might create a better and more accurate product. As an example, OFIC hired outside assistance through a licensed wildlife biologist and former ODF employee to help us better understand the habitat modeling component specifically around marbled murrelets. Frustratingly, after weeks of seeking engagement we were told to wait until the information came out for this meeting, and that our opportunity to engage substantively would be with the Board of Forestry. Knowing that a three-minute testimony through Zoom by a licensed biologist with citizen Board members discussing the intricate nuances of murrelet habitat assumptions and landscape configurations was not likely to result in substantive discussion or real-time changes to the HCA configurations or modeled outcomes under the comparative analysis, we thought it wasn't likely worth the investment to continue that contract, and thus we are all left without that analysis.

Furthermore, we've been told that this will be the only scheduled decision of the Board prior to voting on the final HCP at the conclusion of a likely multi-year NEPA process. I remind you that this information was released on Monday before last. With these comments we formally request that this Board hold your decision until the November Board meeting. That will necessarily provide what has been missing up to this point: a true opportunity for engagement, with real information on the table.

The Habitat Conservation Area (HCA) commitments are far too high

An analysis of HCPs for other landowners, both public and private, demonstrates that the commitments envisioned under this proposal far exceed what was agreed upon for other HCPs. Furthermore, we remain concerned that these very large habitat set asides will contribute very little to northern spotted owl conservation without taking into account the overwhelming impacts from barred owls. One of the largest travesties of my career has been witnessing the economic and social devastation of countless rural communities in Oregon resulting from dramatic declines in federal harvest and then watching any potential species gains erased by the owl's overly competitive cousin. In this instance, one might expect greater actual conservation could be realized through a combination of smaller targeted habitat set asides coupled with an aggressive barred owl management strategy.

ODF must achieve financial viability

It is difficult for OFIC to understand how this Board could support a plan that does not achieve financial viability. It seems completely irresponsible to forward a proposal that does not pay the bills for the Department, instead kicking reconciliation of that issue to the Legislature (who has expressed no interest in absorbing these costs into the General Fund) or some future Board of Forestry. Did the Legislature truly intend Greatest Permanent Value (GVP) to result in bankruptcy for the Department? We are also confused by the costs associated with the modeling in the comparative analysis that shows the Department harvesting nearly 250mmbf in the first cycle under the HCP proposal yet falling short by \$12million dollars.

A lack of confidence with the harvest model numbers

When ODF released draft versions of their current structure-based management plan they also released modeled harvest projections for stakeholders and county beneficiaries to compare and consider. This information was key for stakeholders as they analyzed and took positions with regards to that management plan. When the implementation plan came out in the months following the final adoption of that plan, however, ODF revealed a dramatic reduction of over 100mmbf in the actual harvest volume numbers.

We find ourselves in a similar situation today, being asked to take a position on a plan and being given projected harvest numbers to inform our analysis. It should be no surprise then that we are HIGHLY leery of these numbers, and quite averse to the idea of being burned twice. We want nothing more than to have confidence in the projections, and we have been scrambling with the limited GIS and modeling data provided to gauge that confidence. To date, time and data have limited our ability to substantively come to any conclusion, so we are left with uncomfortable skepticism. We plead with this Board and Department staff to help us understand these numbers. Like you, we want to have confidence in the information being presented to us.

Management should be allowed within the Riparian Conservation Areas (RCAs)

Countless studies have demonstrated the benefits of forest management within riparian management areas. A recent presentation given by Dr. Dana Warren a fisheries scientist at Oregon State University, expounded the relationships between increased light exposure and primary productivity within forested streams. These relationships were also well documented in several studies within the Trask and Alsea paired watershed studies. I have included references to some of these studies at the end of these comments. It doesn't take a PhD to understand these relationships - shaded areas preclude plant growth, increased sunlight allows greater plant growth, bugs eat plants, fish eat bugs, ergo larger and more abundant fisheries result from increased light to streams, especially in overly shaded second growth stands, such as the ones found on state lands in coastal Oregon.

Overly conservative assumptions imbedded in cFMP projections

We are concerned that the projections for the current forest management plan (cFMP) within the comparative analysis far overestimates the impacts of future Endangered Species Act (ESA) listings. These assumptions are primarily responsible for aggressively driving harvest levels down under the cFMP scenario that is presented in the analysis. Recent discussions with senior Fish and Wildlife Service (FWS) staff confirmed the validity of our concerns. It would be far more accurate to provide a range of potential outcomes under varying future conditions resulting from listing decisions. Furthermore, it is odd to us that previous analysis of the cFMP did not account for this degree of listing impacts on the forest.

Concern with an unbalanced approach to GPV in this process; HCP and FMP

This draft HCP represents a staggering commitment to conservation, with approximately 50 percent of the land set aside or dedicated for conservation. OFIC is highly concerned that the focus of the Board and the Department has been squarely on environmental protections for months. And we remind you that these lands were deeded to the state as working forestlands for the purposes of providing revenues for rural communities. The opportunity cost of this draft HCP is surely in the billions of dollars in foregone revenues over its 70-year lifespan. Even under GPV, environmental protections were intended to be balanced with economic and social benefits. With that balance in mind, OFIC is highly concerned that this Board may continue to take bites out of the remaining pieces of land left for management as you finalize a companion forest management plan (FMP). The decision regarding this draft HCP marks one chapter of the overall process - a chapter focused exclusively on conservation - and OFIC expects Board members and ODF staff to bring equal passion, dedication, and vigor in consideration of the other aspects of GPV as you finalize a plan that must achieve economic returns to ensure community well-being and agency financial viability.

In conclusion, I reiterate our concern with timing and process, and respectfully request that the Board hold your decision until the November meeting, thus giving staff time to engage with stakeholders substantively over the next month. Thank you for the opportunity to offer comments.

Sincerely,

Seth A Barnes

Seth Barnes
Director of Forest Policy

Citations regarding riparian forest management and impacts to primary productivity and fish:

Bateman D.S., R.E. Gresswell, D. R. Warren, D.P. Hockman-Wert, D.W. Leer, J.T. Light, and J.D. Stednick. 2018. Fish response to contemporary timber harvest practices in a second-growth forest from the central coast range of Oregon. *Forest Ecology and Management* 411:142-157

Heaston, E.D.^, M.J. Kaylor^, and D.R. Warren. 2018. Aquatic food web response to patchy shading along forested headwater streams. *Canadian Journal of Fisheries and Aquatic Sciences* 75(12): 2211-2220

Kaylor, M.J.^, and D.R. Warren. 2018. Canopy closure after four decades of post-logging riparian forest regeneration reduces cutthroat trout biomass in headwater streams through bottom-up pathways. *Canadian Journal of Fisheries and Aquatic Sciences* 75:513-524

Kaylor, M.J.^, and D.R. Warren. 2017. Linking riparian shade and the legacies of forest management to fish and invertebrate biomass in forested streams. *Ecosphere* 8(6):e01845.

Penaluna, B.E.; Dunham, J.B.; Railsback, S.F. et al. 2015. Local variability mediates vulnerability of trout populations to land use and climate change. PLoS ONE. doi: 10(8): e0135334. <http://www.treesearch.fs.fed.us/pubs/53096>.

Penaluna, B.E.; Railsback, S.F.; Dunham, J.B. et al. 2015. The role of the geophysical template and environmental regimes in controlling stream-living trout populations. *Canadian Journal of Fisheries and Aquatic Sciences*. 72: 893–901. <http://www.treesearch.fs.fed.us/pubs/49270>.

Warren, D.R., S.M. Collins, E.M Purvis*, M.J. Kaylor^, and H.A. Bechtold*. 2017. Spatial variability in light yields co-limitation of primary production by both light and nutrients in a forested stream ecosystem. *Ecosystems* 20(1) 198-210.

Warren, D.R., W. S. Keeton, Bechtold, H.A., E.J. Rosi-Marshall. 2013. [Comparing streambed light availability and canopy cover in streams with old-growth versus early-mature riparian forests western Oregon](#). *Aquatic Sciences* 75: 547-558



Woodland Owners Who Love Their Land

October 6, 2020

Re: Development of HCP for State Forests

Board of Forestry –

Oregon Small Woodlands Association is a non-profit organization that represents the interests of Oregon's family forest owners. There are over 65,000 family forest owners in Oregon and many live within the vicinity of Oregon State Forests. OSWA supports the need for a strong wood product industry and all the infrastructure needed to maintain it. Although most family forest owners do not regularly harvest timber, it is imperative that when they do, there will be an industry there for them to market their timber and the needed infrastructure. Dramatically reducing harvest on State Forests will be detrimental to both. A strong industry supports the economy in rural Oregon where many family forest owners call home.

The strength of the industry is directly proportional to its raw material supply. As the Board evaluates finding the balance between environmental, social, and economic factors related to implementing an HCP, please do not forget about all the impacts it will have on everything related to State Forest management in rural Oregon. Please find an HCP solution that maximizes timber harvest that will benefit all Oregonians, in the long run.

Thank you for your consideration of OSWA's comments.

Sincerely,

Jim James
Executive Director
Oregon Small Woodlands Association



OREGON CHAPTER SIERRA CLUB

1821 SE ANKENY ST • PORTLAND, OR 97214
PHONE (503) 238-0442 • FAX (503) 238-6281
OREGON.CHAPTER@SIERRACLUB.ORG
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Tom Imeson, Chair
Oregon Board of Forestry
Oregon Department of Forestry
2600 State St.
Salem, OR 97310

RE: State Forestry Habitat Conservation Plan

Dear Tom Imeson:

The Oregon Chapter Sierra Club has 80,000 members and supporters in Oregon, and we have had a long involvement and interest in the protection of the forests under consideration in this State Forestry draft Habitat Conservation Plan (HCP). We support the work done so far and request that on October 6th the Oregon State Board of Forestry votes to move the HCP to Phase 3, the National Environmental Protection Act process.

The Oregon Chapter is supportive of this HCP for the following reasons:

- For two years Federal scientists have worked closely with the Oregon Department of Forestry (ODF) to design the conservation locations.
- The commitment is for 70 years, which enables ODF to make long-term plans and investments.
- 275,00 acres of state forests would be under the HCP terrestrial areas, and 77,000 riparian areas would provide 120 feet of buffer measured horizontally for type F streams. This is roughly half of the 640,000 acres managed by ODF.
- Sixteen species are proposed for coverage—nine fish species, three salamanders, two birds, and two mammals.
- An HCP will assure a more predictable rate of timber harvest over a 70-year permit and will reduce costs.

Overall we are pleased to see that the HCP adds much needed protections to areas we care deeply about, however we would also like to add some of our concerns. The HCP covers approximately 50 percent of the state managed areas, we would prefer that all of the forests are covered, or that larger portions of forest are dedicated to conservation. We do not support clearcuts. We have concerns that, where habitat needs restoration in the management of Habitat Conservation Areas, it's important to assure that thinning is not used as an excuse for timber harvesting. Another concern is aerial spraying of pesticides and we urge you to consider alternate means or spraying less.

We appreciate all of the work that has been dedicated to this process and for the opportunity to provide input.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lara Jones', with a long horizontal stroke extending to the right.

Lara Jones
Interim Chapter Director (She/Her)
Sierra Club, Oregon Chapter
oregon.sierraclub.org
503-754-2888
laraloujones@gmail.com

Submitted: Fri 09/25/2020 5:42 AM

Forestry Board Members:

As the Steering Committee for the Friends of Hug Point, we advocate that the Forestry Board gives ODF HCP work continued support and approve the next steps in the establishment of this plan.

Based on Oregon's north coast, the Friends of Hug Point is a neighborhood organization formed to work with ODF to find an equitable long term plan for a forested area immediately east of our homes along Hwy 101 south of Cannon Beach, known both as Norriston Heights and Hug Point (the larger property). We are all property owners in this rural north Oregon Coast area.

Although this ODF-managed parcel of land provides the drinking water (through state granted water rights) for our 20+ homesites and provides both current and future habitat for ESA-listed marbled murrelet, a portion was designed as a timber sale candidate in 2018/19 by ODF. We believe that a timber sale and the resulting clear cut of this property would have had severe impacts on our property and appreciate that this sale has been put on indefinite hold. We have been working with the ODF team as we investigate options for the property.

Our neighborhood has come to appreciate that this situation is a microcosm of the larger challenge facing the management of Oregon's forest and water resources. While few in our neighborhood were actively involved in environmental or conservation causes, we have had quite a lesson over the past year in the complex issues facing Oregon to find the right balance between: fulfilling the economic expectations of the timber industry and rural counties; the need for protecting sources of drinking water for rural Oregon residents; the recreation and esthetic value of forested areas as our urban areas grow; and the protection of habitat for endangered and other wildlife. And these issues must be viewed through the lens of current events; the tragic wildfires of September and a growing exodus of urban residents freed by their employers, because of COVID-19 concerns, to work from home - wherever that might be.

Oregon has been blessed with both ample supplies of timber and water, but unfortunately the splintered regulation and legislation surrounding both indicate that we have taken these for granted and need to forge constructive and long term management disciplines to sustain these valuable resources.

We believe that a core ingredient in managing timber and water resources is a strong statement about habitat protection. It goes beyond endangered species habitat...it translates into protecting all forms of habitat, including human habitat. Providing a positive vote to allow ODF to continue its work on the proposed HCP put forward does send this strong statement. Including the Hug Point parcel in this plan would also indicate that the Forestry Board is trying to find a constructive balance on the competing demands on our timber and water resources.

Thank you for your consideration of our views on this important topic.

Respectfully submitted on behalf of the Friends of Hug Point by the following members of our neighborhood's Steering Committee:

Jay Haladay
81170 Sunset Vista Road
Arch Cape, OR 97102

Nadia Gardner
80285 Woodland Heights Rd
Arch Cape, OR 97102

Thomas Merrell
31976 East Ocean Road
Arch Cape, OR 97102

Kristin Covert
81087 Arcadia Road
Cannon Beach, OR 97110

Roger Neugebauer
80424 Highway 101
Arch Cape, OR 97102
Emily Ericson and Richard Martens
32774 Picture Windows Lane
Arch Cape, OR 97102
ericson@comcast.net

Public Testimony: HCP Board Decision - Item 2

October 6, 2020

Submitted by: Scott Gray

Representing Stimson Lumber Company

Chair Imeson, State Forester Daugherty and members of the Board. For the record, my name is Scott Gray and I am the Director of Western Resources for Stimson Lumber Company. My responsibilities include all aspects of management of Stimson's fee lands as well as log procurement for our three Oregon sawmills. Thank you for the opportunity to offer comment on the State Forest Habitat Conservation Plan (HCP).

While I believe HCPs are a viable and important tool to conservation management, I am opposed to the current draft HCP because I do not believe it achieves a balance between the biological, social and economic benefits that the State Forests could provide. Specifically, I believe that there is too much land set aside in habitat conservation areas. This will result in much lower harvest levels than could be possible, resulting in fewer jobs, lower taxes paid and fewer economic benefits to the Trust Counties.

To start, I hope we can all agree that as a society, we desire wood products to be used instead of non-renewable products. We should desire that demand for wood should increase. So, to meet demand for wood products, trees will be harvested. Where that wood is harvested can have a great impact on the environment as well. It can be harvested in some of the most productive forests in the world, which include State Forests in Oregon, or it can be harvested elsewhere. As a Forester who has practiced in both California and Oregon, I can speak from experience that in Oregon, including the State Forests, the non-timber resources are given equal protection and the same consideration as timber management. Oregon rules and regulations along with foresters' professional ethic insists that these resources be protected. This has been confirmed in numerous studies such as the paired watershed studies. This proposed HCP puts about half the lands off-limits to forest management. Yet, demand for wood will not diminish so trees that could be harvested on this off-limits area will have to be harvested elsewhere. Since not many areas in the world have comprehensive laws like Oregon, it is likely that these trees will be harvested with less protection to the other forest resources. This is the unintended consequence of putting vast segments of land off limits to timber production and this draft HCP has the most area set aside for conservation measures of any forestry HCP on the West Coast.

The half of the State Forests that is available for timber production also includes restrictive conservation measures that significantly reduce the net present value of these lands. The most impactful is probably the requirement that 40% of the available land be kept in age classes above 60-years of age. These areas designated for timber production should be managed in a manner that maximizes net present value of the land and helps bring economic balance into the plan.

An HCP is exactly that, a plan to conserve habitat. It does not consider the economic or social impacts that result from such a plan. However, should this HCP move forward, there needs to be assurance that the harvest levels noted by ODF are achieved and that ODF be held accountable to achieve those harvest levels.

I ask that the board not direct ODF staff to finalize the draft HCP in its current form nor to move into the NEPA process. Instead, I ask the board to direct ODF staff to explore opportunities to reduce the size of conservation areas. For example, the HCP predicts a significant increase in acres of highly suitable northern spotted owl habitat but has few specifics regarding barred owl management. We have learned from other areas, that increased habitat does not lead to increased owl populations due to competition from barred owls. I submit that the total HCA acres could be reduced, timber production could increase and spotted owl populations would benefit if an aggressive plan to control barred owl populations was a strong, specific HCP commitment. I also ask that the HCP promote a greater emphasis on timber production in those acres that have been designated for timber production in order to increase the benefits to society and the economy.

Respectfully submitted by Scott Gray



September 28, 2020

Oregon Department of Forestry

RE: Habitat Conservation Plan on State Forest Lands

To the Board of Forestry,

Sustainable Northwest is writing to express our full support for the continued pursuit of a Western Oregon State Forest Habitat Conservation Plan (SFHCP) with NOAA Fisheries and US Fish and Wildlife Service. We urge members of the Board of Forestry to vote in favor of moving forward with the SFHCP process on October 6, 2020.

Sustainable Northwest believes a healthy economy, environment, and community are indivisible, and that all are strengthened by wise partnerships, policies, and investments. Founded in 1994, our work focuses on forests, farms, and ranches; clean energy; water; and green markets throughout the Greater Northwest. Our Forest Program centers on the management of public and private forests, including support for community forests and national forest collaboratives.

A Habitat Conservation Plan for Western Oregon State Forest Lands will provide long-term regulatory and business certainty through a transparent and open process. There are multiple benefits to the Department of Forestry in terms of management planning, staffing needs, anticipated revenues, and reduced litigation. The conservation outcomes of durable areas managed to prioritize habitat will be significant for sensitive species and the ecosystem. In short, the SFHCP represents a compromise that SNW supports, balancing the needs of multiple stakeholders and acknowledging the value of forests for habitat, timber, water, and recreation. We hope you will vote “yes” to continuing the effort of an SFHCP.

Sincerely,

A handwritten signature in blue ink, appearing to read "Greg Block", is written over a light blue horizontal line.

Greg Block
President

1130 SW Morrison, Ste 510
Portland, Oregon 97205
MAIN LINE (503) 221-6911
SOCIAL @SustainableNW
SustainableNorthwest.org



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**Tillamook
Chamber of Commerce**
208 Main Ave.
Tillamook, OR 97141
503.842.7525

www.tillamookchamber.org

September 25th, 2020

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

Dear Chairman Imeson,

The Tillamook Area Chamber of Commerce Board of Directors would like to encourage you to reject the proposed Habitat Conversation Plan along with the changes it poses to State Forest management. The Chamber represents numerous timber related businesses and has a vested interested in a healthy community.

Timber is a significant industry in Tillamook and any change that decreases harvest and revenue is damaging to our community. The Tillamook area is home to two lumber mills that employ over 250 living wage jobs. In addition to these mills, there a over a dozen small family timber operators in Tillamook that rely on sustainable local timber harvest. The proposed Habitat Conservation Plan has the potential to impact these local businesses in a crippling way.

As a rural community, we are reliant on stable funding for many of our local governments and special districts. While the impacts to these entities are not yet calculated [to our knowledge] for our area there, however there is no decrease in revenue that is acceptable at this time.

Please reject the proposed Habitat Conservation Plan and apply all efforts to a more and fair and equitable approach for our rural communities.

Regards,

A handwritten signature in blue ink, appearing to read "Justin Aufdermauer", is written over a white rectangular background.

Justin Aufdermauer

cc: Peter Daughtery, Oregon State Forester

AGENDA ITEM F
Attachment 21
Page 1 of 1

building community.



October 2, 2020

Tom Imeson, Chair
Board of Forestry

Re: Trout Unlimited Comments on the Board's Habitat Conservation Plan Decision (Agenda item 4)

Dear Chair Imeson and Members of the Board,

Thank you for the opportunity to present testimony on the Oregon Department of Forestry's (ODF) recommendation regarding whether to proceed with the development of the Western Oregon Habitat Conservation Plan (HCP). My name is Chandra Ferrari and I am Senior Policy Advisor for Trout Unlimited (TU), a non-profit organization dedicated to the conservation of cold-water fishes, such as trout and salmon, and their habitats. Trout Unlimited has more than 300,000 members and supporters nationwide including over 3,000 in Oregon. TU members regularly fish and recreate in streams that run through Oregon's State Forests. Streams like the Trask, Nehalem, Wilson, Kilchis, and Miami all support strong fisheries and have significant blocks of state forest land. Thus, TU members have a strong interest in ensuring that forests are managed to help support healthy streams and resilient fish populations.

TU strongly supports the recommendation of ODF to continue the HCP process and urges the Board to vote to affirm this recommendation and move the HCP into Phase 3. The HCP presents the best opportunity to provide durable conservation outcomes for state forest lands while increasing certainty for entities that rely on timber harvest. Additionally, the HCP and accompanying National Environmental Policy Act (NEPA) process provide stakeholders with significant "public input" opportunities which will help build trust between ODF and affected parties and, ultimately, confidence in the deliverables. To date, ODF has taken significant steps to provide continuous information and input opportunities to stakeholders; effort that is truly appreciated.

Stronger, more durable, protections for streams and forests to protect Oregon's fish and wildlife populations, ensure clean water and support resilient forest ecosystems are expected HCP outcomes. While we may still recommend modifications to the HCP as the process proceeds, we appreciate the inclusion of many important metrics and conservation measures that will help achieve these outcomes. For instance, we appreciate that the draft HCP is guided by biological goals and objectives. Inclusion of metrics by which progress toward achieving goals can be measured is critical especially for a 70-year plan. We also appreciate that the draft HCP protects more high quality and contiguous habitat compared to alternative Forest Management Plan (FMP) scenarios and includes a conservation fund to implement habitat management activities that benefit covered species. Another important component of the draft HCP is the inclusion of

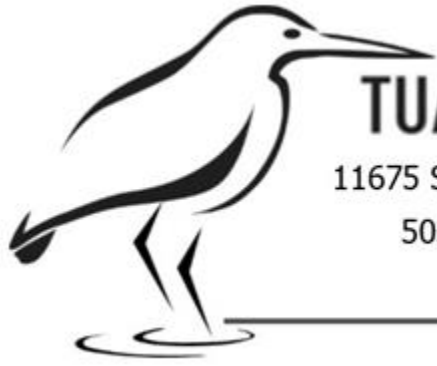
Riparian Conservation Areas that are managed to reduce impacts to adjacent streams. Finally, the adaptive management framework is critical to ensuring, over the long term, that HCP implementation is effective and transparent. We look forward to continuing discussions regarding the details of the framework to better understand the governance structure, triggers and responses and stakeholder input opportunities.

As the Comparative Analysis demonstrates, the HCP is critical because it would provide security to the various partners involved -- the conservation and fishing community and public at large will get security on conservation commitments, and beneficiaries of the timber program will receive security in harvest revenues over the long-term. Additionally, it will provide ODF with more financial certainty as an HCP will reduce the large payments that ODF makes to survey for threatened and endangered species and it will reduce litigation risk. In sum, the HCP provides a workable compromise that balances competing values and will help put our forests on a path to sustainable, and science-based management. Accordingly, we respectfully request that the Board vote to continue the HCP process.

Thank you for the opportunity to provide comment today and we look forward to working with the Board, the Department and other stakeholders as the HCP process proceeds.



Chandra Ferrari
Senior Policy Advisor
cferrari@tu.org
(916) 214-9731



TUALATIN RIVERKEEPERS.

11675 SW Hazelbrook Road, Tualatin, Oregon 97062

503-218-2580 • tualatinriverkeepers.org

info@tualatinriverkeepers.org

October 1, 2020

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

Submitted via email

Re: Draft Western Oregon State Forest Habitat Conservation Plan

Tualatin Riverkeepers (TRK) is a community-based organization that protects and restores the Tualatin River watershed. We build watershed stewardship through engagement, advocacy, restoration, access, and education. We appreciate the opportunity to comment on the Draft Western Oregon State Forest Habitat Conservation Plan (HCP). The headwaters of the Tualatin River are in the Coast Range and a threaten anadromous species, winter steelhead, actively use the tributaries and the mainstem in the Coast Range. Therefore, TRK has an invested interest in this process and encourages the Board of Forestry to vote to move the HCP forward into the federal National Environmental Policy Act (NEPA) process.

Although the HCP still needs some additional work to be truly protective of critical species and habitats, the draft is an improvement over the current management practices and will provide more stability for endangered species. The NEPA process will also allow federal scientist to lend their expertise to ensure management measures taken in the HCP adequately protect listed species. Additionally, continuing to work towards an HCP will free up resources of stakeholders to focus on management instead of conflict including the state, conservationist, and the timber industry. Since the HCP is moving in the right direction, TRK asks the Board of Forestry to vote “yes” to continue this process.

Thank you for the opportunity to comment on the proposed Draft Western Oregon State Habitat Conservation Plan. Again, we encourage the Board of Forestry to vote to continue the HCP process on October 6th.

Sincerely,

A handwritten signature in black ink, appearing to read 'AS', with a long horizontal stroke extending to the right.

Ashley Short
Riverkeeper & In-House Counsel
Tualatin Riverkeepers
Ashley@tualatinriverkeepers.org

September 8, 2020

Board of Forestry Chair Tom Imeson
State Forester Peter Daugherty
2600 State Street
Salem, OR, 97310



Re: Proposed State Forest Habitat Conservation Plan

Chair Imeson and State Forester Daugherty,

The City of Banks is a small, rural community located in Western Washington County, situated just outside of the Portland Metropolitan Urban Growth Boundary. Wood manufacturing is critical to the health and vitality of our community. Our sawmill, located just a few blocks off Main Street, employs roughly 60 people in good, family-wage jobs. The activity generated by the mill supports our local stores and cafes not to mention the small, family-owned logging and trucking businesses that get the wood from the forest to the mill.

Roughly half of all the wood needed to maintain our local sawmill comes from surrounding state forests. For this reason, we are deeply concerned with the initial modelling work done by the Oregon Department of Forestry (ODF) in regards to their proposed Habitat Conservation Plan (HCP) for state forests. As you know, this plan would guide management on state forestland for the next 70 years and set aside half of these productive lands for a habitat generation. ODF estimates the HCP, as currently proposed, would result in a 25-30 percent reduction in timber harvests on nearby state forestland. Such a reduction would be devastating to our sawmill and our community. An HCP is not a viable solution to state forest management challenges if it compromises the future of the local wood manufacturing sector.

We urge you to protect the long-term sustainability of forest sector businesses in our community. Communities like ours will have to deal with the long-term negative effects of dramatic harvest reductions on state forests. Please keep this in mind when reviewing a potential HCP and urge ODF to develop a plan that better considers the economic sustainability of the communities that surround and depend on these working forests.

Sincerely,

A handwritten signature in blue ink, appearing to read "Peter C. Edison".

Mayor Peter C. Edison & the Banks City Council

CC: Chair Kathryn Harrington, Washington County Board of Commissioners
Vice Chair Dick Schouten, Washington County Board of Commissioners

All trails lead here.™



210 Laurel Avenue • Tillamook, OR 97141
phone 503-842-2472 • fax 503-842-3445

September 2, 2020

Oregon State Board of Forestry

Chair David Yamamoto, Tillamook County Board of Commissioners

As Mayor of Tillamook and representing the expressed concern of the majority of our City Council we wish to relay our concern over the newly released Habitat Conservation Plan and the proposed changes to State Forest Management.

Our economy in Tillamook and on the North Coast is heavily impacted by timber. One of our mills in the center of our community alone employs approximately 170 people in family wage jobs generating roughly \$100 million per year in direct and indirect economic activity in our county. This mill and as many as 25 others are heavily dependent on state forest land timber harvest. By converting more than 331,000 additional acres into wildlife reserve the plan will result in jobs lost and a forest that will potentially become a financial liability. Nearly 80 percent of the proposed set asides will be borne not only by Tillamook but by the surrounding north coast communities. It could possibly result in a loss of \$27+ million dollars in annual revenue to state and rural counties and hundreds of millions of dollars in lost income to local businesses. Think of the small family owned trucking operations that haul the wood to the mills. Additionally a 32% harvest reduction will cause a 32% decrease in timber revenues that support our local schools and governments.

I could continue to exclaim the damage that could potentially be inflicted on our area schools, governments, business and people by this decision. I encourage you to reexamine the plan and work toward improving it acknowledging the impact in a manner that will not devastate our economic viability. Please reject the currently proposed Habitat Conservation Plan and consider the wider implications that such a plan would bring to our area.

Sincerely,

Suzanne Weber, Mayor
Tillamook, Oregon

Council President.

Council Members:

- Ward 3
 WARD 6
 WARD 5



August 28, 2020

Board of Forestry Chair Tom Imeson
State Forester Peter Daugherty
2600 State Street
Salem, OR, 97310

Re: Proposed State Forests Habitat Conservation Plan

Chair Imeson and State Forester Daugherty,

On behalf of the Warrenton City Commission, I am writing to express our concerns with the Oregon Department of Forestry's (ODF) efforts to negotiate a 70-year habitat conservation plan (HCP) for state forests. Given an HCP would impact state forest management—as well as revenue and economic opportunities for our community—for generations to come, we are alarmed by the limited information ODF has shared with the public to date.

It is our understanding that in order to obtain this HCP, ODF is proposing to set aside upwards of 60 percent of state forestland for conservation and habitat creation. Initial modeling of the proposed HCP, released just last month, indicates such set asides would result in a 25-30 percent decrease in timber harvests on North Coast state forests. As these working forests make up nearly half of all forestland on the north coast, we are very concerned about the impacts such a plan will have on our community.

Large reductions in harvest levels on northwest state forests would be highly detrimental to our local manufacturing sector. Our community is home to wood processing facilities as well as family-owned logging, trucking, and road construction businesses that provide much needed year-round, living wage jobs. I need not remind you of the ancillary businesses that also rely on these jobs for the survival of their own. Our residents also depend on the revenue generated from state forest harvests for county services and local taxing districts. ODF's ability to negotiate a fair and economically viable HCP will have direct impacts on the economic and social fabric of our community.

We are also very concerned about the agency's long-term ability to manage these lands if harvest levels dictated by an HCP fall below levels needed to fund management of these expansive, multi-use public forests. Our residents work and recreate on these lands and we depend on ODF's ability to maintain all the benefits they provide and protect against the threat of wildfire. Pursuit of an HCP should not compromise the agency's ability keep these lands productive, accessible, and healthy.

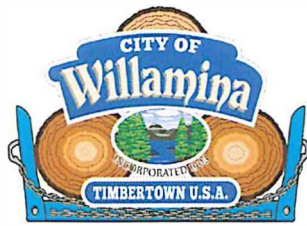
With the potential long-term social, economic, and environmental consequences of an HCP, communities like ours need to receive detailed information in a timely manner. Unfortunately, ODF has provided very little in the way of clear and tangible information as to the scope and impact of the proposed HCP. It is our understanding that ODF plans to release a new round of HCP modelling data in mid-September and the Board of Forestry is scheduled to vote on whether or not to accept the draft HCP shortly thereafter on October 6th. We urge the agency to engage in meaningful dialogue with local communities and make more information available so key stakeholders can provide informed feedback on the plan's progress.

Sincerely,

A handwritten signature in blue ink, appearing to read "Henry A. Balensifer, III". The signature is written in a cursive style with a circled initial "H" at the beginning.

Henry A. Balensifer, III
Mayor

CC: Commissioner Mark Kujala, Clatsop County Commissioner District 1 (Warrenton)
Don Bohn, Clatsop County Manager



Mayor Ila Skyberg

Council Members:

Rita Baller, Council President
Bob Burr
Craig Johnson
Roberta Lawson
Theresa McKnight
April Wooden

City Management:

City Manager: *Kenna L. West*
Finance Manager: *Scott Clark*
Public Works Director: *Jeff Brown*
Library Director: *Sarah Frost*

September 8, 2020

Mr. Tim Imeson, Board of Forestry Chair
Mr. Peter Daugherty, State Forester
State of Oregon
2600 State Street
Salem, Oregon 97310

RE: State Forest Habitat Conservation Plan

Chair Imeson and State Forester Daughterty,

The City of Willamina is a small city of 2,250 located in Yamhill and Polk Counties. Our community is home to two large wood manufacturing facilities: (1) a Boise Cascade veneer plant and (2) a dimensional sawmill, owned and operated by Hampton Lumber since 1942. Together, these operations employ hundreds of people in good, family-wage jobs. We cannot overstate how important the economic activity generated by surrounding timberland is for our families, our businesses, and our community.

Local wood manufacturers depend on state forest harvests. We are alarmed that the Oregon Department of Forestry (ODF) is considering setting aside half of all productive state forestland for habitat creation to achieve a Habitat Conservation Plan (HCP). Modelling data released by the agency shows this HCP would result in a 25-30% drop in timber harvest on these lands. This would harm forest sector jobs and the long-term resilience of communities like ours.

We urge you to reconsider the trajectory of this HCP and stand up for the communities that proudly work these lands to produce much needed, sustainably-sourced wood products.

Sincerely,

Ila Skyberg, Mayor

cc: Craig Pope, Polk County Board of Commissioners
Casey Kulla, Yamhill County Board of Commissioners
Confederated Tribes of Grand Ronde
Chief Fred Hertel, West Valley Fire District
Carrie Zimbrick, Willamina School District Superintendent

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411 N.E. "C" Street, Willamina, Oregon 97396-2783 Telephone: (503) 876-2242 / Fax: (503) 876-1121

www.willaminaoregon.gov

AGENDA ITEM F

Attachment 27

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Submitted: Fri 10/02/2020 4:50 PM

Oregon Board of Forestry,

The Benton County Board of Commissioners wants to go on record supporting the Department of Forestry's proposed Habitat Conservation Plan.

We have experience in such work and believe that HCPs are a vital tool for forest, public and private lands management. Clean air and water are essential to forest health. Healthy forests are essential to wildlife and to recreational opportunities. Healthy forests are essential to a healthy economy. We recognize that timber production is important to the economic wellbeing of our communities. A good habitat conservation plan acknowledges the importance of all these factors.

We know the HCP process can be lengthy and contentious. In the end we believe that the Department has listened to all interested parties. The proposed Department of Forestry Habitat Conservation Plan is an important path forward in managing state forest lands for benefits to all communities.

Commissioner Pat Malone
Commissioner Xan Augerot
Commissioner Annabelle Jaramillo

Submitted by: Annabelle Jaramillo, Annabelle.E.JARAMILLO@Co.Benton.OR.US

Submitted: Fri 10/02/2020 5:01 PM

Oregon Board of Forestry,

I wished to take a moment to offer some thoughts regarding your future decision to pursue or to not pursue the HCP further. I am urging you to press pause after such a devastating fire season, some of which was on and around state forests. I ask that you have ODF take a step back, reassess all of the changes that the fires have caused both in actuality via loss and damages and politically. Senator Ron Wyden, in September, called for a coordinated response to prevent catastrophic forest fires from continuing to ravage Oregon and other states in the future while acknowledging that “misguided non-management priorities beat back every attempt to manage our forests based on science.” Wyden stated that Oregon has more than 2 million acres that need to be “treated” and have “hazardous fuels” removed. He went further to state that “Without those treatments, a lightning strike or a carelessly dropped match can create an inferno that can leap a river and rip through thousands of acres in the blink of an eye”. Then I look at the HCP current plan and I sense a huge “environmental swing” vs maintaining balance between environment, social, and economy.

As a commissioner-elect please realize that the revenue generated from the forests is a key part of the county’s budget economically while the jobs generated by the volume harvested is a key social component. I’m not looking just at the numbers, I am looking at the social impact that a reduction in harvest will cause within our county regarding jobs, schools, police and fire, and other taxing districts that depend on the revenue and jobs our state lands generate.

As I have communicated with fellow commissioners and private industry members extensively over the past 2 months, I have come upon a handful of questions and concerns which I feel aren’t being addressed. One of my biggest concerns with reading and listening is that it feels as if the Department of Forestry is treating the entire state as a whole vs as it should be treated, individual regions with very significant differences. My first question is to see if you/we can address the regions differently according to their needs, ecosystems, and production values? I feel that we need to address Clatsop and Tillamook State Forests separately from the other regions throughout the state due to the ecosystem differences present in these forests. I personally agree that an HCP has value in regards to the protection from future litigation, my concern leans towards what economic impact that the current HCP will have on my county.

I then look for information on how many acres are being set aside by county and for what species. How many of the 15 species are Clatsop concerns vs state concerns and how do the numbers break out? How many acres are we currently setting aside for individual species by county vs what the HCP will set aside, and why? Did the board suggest these species? If not, why were they selected? Is there the flexibility of dropping a species if one or two is causing large acres of reserve requirements? The point behind all of these questions is to see if one or two species is driving large numbers of our acres and to have a discussion on if that specific species is a concern in the region and worth the loss of production acres. If there is a large

discrepancy in acreage set aside for species vs their presence in that area, there would be an opportunity to look for an HCP that covers all species in some areas and only certain species in others. For instance, a HCP covering Marbled Murrelets and Coho on all districts and owls and red tree vole on southern districts. This would leave the Clatsop and Tillamook State Forests with take avoidance for owls.

I also wish to encourage you to converse more with the stakeholders that will be heavily affected by this HCP. When choosing the reserve areas, who determined the stands and who was in the room arguing for as many acres as possible in production. Were counties or industry members involved? Who was representing the counties/departments interests in the negotiation to retain these acres? Did the department receive any comments from the field workers in ODF offices on the believability of the models being provided? I find it a little unbelievable that we can remove a large number of acres and maintain current production “promises”. As it stands, I see a huge fiduciary loss for Clatsop and if you read Steve Zika’s article (dated September 3, 2020) in the Daily Astorian, it outlines many concerns.

In conclusion, I ask that you press pause and consider the comments from concerned stakeholders. Our forests are still burning as we discuss an HCP. As this decision is being made the Oregon Department of Forestry is just now assessing the damage in areas from these devastating burns. How many of these acres will be no longer viable as habitat remains to be determined. That fact on its own would cause me to pause on a decision that will affect us for the next 70 years.

Thank you for your time,
Courtney Bangs
Clatsop County Commissioner-Elect
Astoria, OR
courtney@courtneybangs.com



Clatsop County

District 4 Commissioner

800 Exchange St., Suite 410
Astoria, OR 97103
(503) 325-1000 phone / (503) 325-8325 fax
www.co.clatsop.or.us

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

October 2, 2020

To the Board of Forestry:

This letter is from individual Clatsop County Commissioners: Kathleen Sullivan, Sarah Nebeker, and Pam Wev. We are speaking from our individual values and perspectives, rather than for the entire board.

As Clatsop County Commissioners, we support continuing the process of seeking a Habitat Conservation Plan on State Forests lands.

We understand the importance of the timber industry to the State of Oregon and specifically to Clatsop County. We recognize the revenue contribution Clatsop County receives from State Forest lands. We recognize the cultural, historic, and economic role natural resource extraction plays in Clatsop County.

Clatsop County with borders on the Pacific Ocean and the Columbia River, recognize the importance of the fishing industry to our area, and to the role our fishers and processors play in our national and international food supply. We also recognize that salmon species return to their primordial home here in Clatsop County's rivers and forest streams, thereby linking forests and fish.

Clatsop County supports sustaining healthy balanced habitat within our county to ensure the production of timber and the availability of fish harvest. We respect the fact that the Endangered Species Act is federal law. We support actions to prevent the extinction of plant and animal species under our watch. We believe it is our role as decision makers to ensure future generations also have the opportunity to enjoy the benefits of healthy functioning ecosystems in which to live, work and recreate.

We have heard from the Oregon Department of Forestry that the current "take avoidance" strategy now in place on State Forest land is expensive, time-consuming, and unpredictable. We recognize that Clatsop County fully uses its share of revenue from State Forests and would like to have certainty in receiving said revenue. Habitat Conservation Plans are in use nationally and internationally to protect endangered species and produce predictable revenue and is an alternative to take avoidance. Clatsop County also recognizes that litigation, ballot measures, and extreme politics can be disruptive to the management of forest lands. A Habitat Conservation Plan is a process that involves years of negotiation with federal, state, local, and tribal agencies and entities adhering to best current science

AGENDA ITEM F

Attachment 30

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in order to have a plan that will be successful in producing and protecting both revenue and habitat for decades to come.

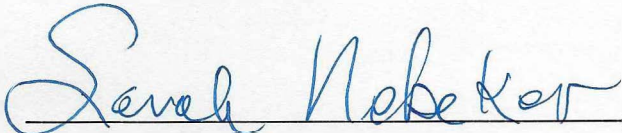
Clatsop County also recognizes that a Habitat Conservation Plan is a compromise. The loudest voices heard in this process have been from both the timber industry and the environmental agencies. We believe it is essential that the multitude of interests that are represented by both timber and environmental voices be heard. We also understand that during this time of climate change with finite resources pressured by increasing population, we must find a moderate path that serves the greatest good for our communities and future generations.

As Clatsop County Commissioners, we support the continued exploration of a Habitat Conservation Plan on State Forest lands. We also commend the good faith efforts and hard work the Oregon Department of Forestry and the multiple agencies involved have displayed over that past few years in bringing this project to this point. We ask the Oregon Board of Forestry approve the continuation of these efforts.

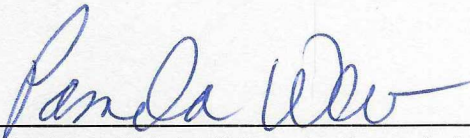
Sincerely,



Kathleen Sullivan, District 4 County Commissioner



Sarah Nebeker, District 2 County Commissioner



Pamela Wev, District 3 County Commissioner

Council of Forest Trust Land Counties

Local Government Center
1201 Court Street NE, Ste 300
Salem, OR 97301

David Yamamoto – Chair Commissioner Tillamook County	John Sweet – Vice Chair Commissioner Coos County	Bill Baertlein Commissioner Tillamook County	Kathleen Sullivan Commissioner Clatsop County	Dick Schouten Commissioner Washington County	Will Tucker Commissioner Linn County	Bob Main Commissioner Coos County
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October 6, 2020

Chair Imeson
State Forester Daugherty
Members of the Board of Forestry

For the record, I am Tillamook County Commissioner David Yamamoto, Chair of the Forest Trust Lands Advisory Committee.

We have travelled a long and tortuous route to get to this point where the Department of Forestry is ready to submit to the Board of Forestry, a draft Habitat Conservation Plan which we received a short 2 weeks ago. This draft HCP, encompassing 384 pages, covers all 3 modeling exercises performed by the Dept. While it seems each subsequent model run improves harvest and financial outcomes to a small extent, none rises to the level of creating a scenario that meets the demands of greatest permanent value.

Remember, the Oregon Department of Forestry manages 729,859 acres of Board of Forestry (BOF) lands for which the Forest Trust Land Counties have a protected and recognizable interest. This interest has been determined by three (3) Circuit Court decisions...Marion County Circuit Court – Tillamook I; Tillamook County Circuit Court – Tillamook II; and Linn County Circuit Court – Linn County Class Action. It is clear that these lands are to be sustainably managed to provide timber revenue to the state, local schools and communities, and local taxing districts.

I feel some explanation is in order as to why FTLAC has been on hiatus for the past several months. As we all know, a pandemic hit on a worldwide basis this past year and Oregon was greatly impacted starting in March. While county commissioners have received much guidance from both the Federal and State governments, it is truly the county commissioners on the ground, across this country, that have been responsible for the implementation of this guidance.

I was always busy as a commissioner, but once the pandemic hit, my job duties expanded exponentially. Schools went on a distance learning scenario and after speaking with all 3 school district superintendents in Tillamook County, I found that over 40% of our students could not participate in distance learning due to a lack of adequate internet access, again another shortfall affecting many rural counties. As the county commissioner representative on the Oregon Broadband Advisory Council, I have

cobbled together almost \$1M and am working as I speak to you today, to get as many of our children as possible hooked up to broadband internet as quickly as possible.

Tillamook County has seen a record number of visitors to our beaches this summer. Our Sheriff's Office has minimal staff to handle the 26,000 residents of Tillamook County, yet this past summer at times brought well over 100,000 visitors daily to our beaches, overtaxing our Sheriff, ambulance, fire and emergency services, search and rescue and with few restaurants open, our grocery stores shelves were empty for our local residents. These are but a few of the many issues we have faced in Tillamook County and the rest of Oregon as the Dept continued work, full speed ahead, on the HCP.

Current modeling of HCP harvest numbers and revenue projections are not acceptable to the trust counties; nor are they sufficient to financially support the Dept. They are far lower than the HCP Business Case Analysis brought to this Board and trust counties in Oct. 2018. The HCP Business Case Analysis was provided to gain approval to continue development from the BOF and FTLAC, which the Dept received. We now find ourselves in this impossible position of considering an HCP with harvest and financial outcomes not acceptable to the trust counties and should not be acceptable to the BOF or Dept given the lack of financial sufficiency to support the Departments operations in the future.

This HCP, which is the second attempt by the Dept, the first being rejected because, it too, was financially insufficient, places too much emphasis on habitat and not enough on harvest and revenue to the counties and to the Dept. Over 50% of state forest lands would not be eligible for harvest under this HCP. This HCP does not reflect any concern or understanding of counties financial condition or needs nor the Departments. This HCP does not show what the forests are capable of producing, therefore is making decisions with no context of what is being given away. Most important, this HCP does not even attempt to address the concept of Greatest Permanent Value, which was clearly supported in the recent Linn County Class Action Lawsuit decision.

Dedicating half of the State Forest Trust Lands to habitat reserves has been considered and rejected at least twice before. In 2004, environmentalists put Measure 34 on the ballot. It would have dedicated 50% of the forest to wildlife reserves. Voters rejected that measure 79% to 21%. Why is it a good idea now? And in 2006, ODF's H&H modeling evaluated an alternative that would have dedicated 50% of the State Forest Trust Lands to wildlife reserves. The 2006 BOF did not adopt that plan then. Why attempt to do it now?

Again, this HCP dedicates more than 50% of the land base to habitat. This allocation of land will be permanent and fixed for at least the 70-year term of the HCP. This produces stability and certainty for wildlife habitat interests. On the other hand, timber harvest, and all of the economic and social benefits that it brings to our communities, is

treated as simply a residual output...it is what you are left with after dedicating over 50% of the land base to habitat.

This residual nature is demonstrated in the fact that the HCP shows declining harvest levels over time. It is demonstrated by the fact that management outside the 50% dedicated to habitat is further constrained by habitat objectives such as 40% of the land base outside the habitat conservations areas must be 60 years and older as well as other policies at ODF's discretion such as inner gorge protections, terrestrial anchor sites and other policy decisions. When all is said and done, only 45% of the land base is available for sustainable timber harvest. And this is harvest that fits in...after everything else is taken care of.

Neither the 384 page HCP nor the 173 page Comparative Analysis say anything at all about the employment, wages and income that come from managing the State Forest Trust Lands. Nor do they even attempt to list the social benefits provided by the timber revenue that flows to the counties and special districts. It is notable that the Dept does describe the benefits of recreational use, cultural uses, but nothing about the use of the forest for jobs.

Rural counties are dependent on natural resource economies and it seems no thought in the development of this HCP is being afforded to family wage, fully benefited jobs, schools and a necessary increase in funding by the legislature to the common school fund for every dollar taken away from school districts that receive state timber revenue, 911 districts, sheriff's patrols, fire and rescue, health care systems, and many other social and economic disasters that await us when timber revenue craters.

This Departments own 2019-2020 budget request states: "The Division's management practices provide sustainable economic, social and environmental benefits to Oregonians. Timber sales are expected to generate \$126M for counties in which state forests are managed by the Division; \$6.7M for the Common School Fund; and \$72M for the Departments management of Board of Forestry lands. State forest timber harvests support approximately 798 direct jobs and 2686 total jobs. Timber revenues distributed to the counties support local K-12 education, health and human services, public safety and other essential community functions. Active forest management provides revenue for counties, social services and education. It builds communities by supporting family wage jobs and contributing to local, regional and state economies." How can the BOF possibly evaluate whether the HCP represents GPV without any data about the economic impacts of the proposed plan.

The Dept has yet to demonstrate to our satisfaction that this is the very best deal it can get from the Federal agencies. Under this HCP, only 45% of the State Forest Trust Lands is available for long term, sustainable forest management with multiple rotations. This is less than the Washington DNR and it far less than what private landowners have been able to negotiate. Why does it appear that the Dept is giving up far more than is required.

Another huge issue is the true viability of the numbers in the present HCP. It appears that these numbers are the best that can be derived from the current iteration of the HCP. The Dept. must provide more certainty about harvest levels. We are reminded by the Dept that the harvest levels in the Comparative Analysis are projections made for a relative comparison. They are unwilling to make a strong commitment to these harvest projections. Yet, the HCP makes a concrete allocation of land for habitat protection, and the Dept should be willing to make a commitment to an actual harvest level. Without a reasonable expectation of the certainty of harvest outcome, how can we make a fair GPV determination.

This HCP must allow the Dept to be financially viable without diminishing the County share, which at one point was actually shown on a chart developed by the Dept. The HCP provides sustainability and certainty for wildlife habitat. It does not, however, provide a certain future for the Oregon Department of Forestry...projected annual net operating losses are in the range of \$20M annually. The economic extinction of the Dept after instituting a faulty HCP is unacceptable to us and needs to be fixed before the BOF can approve an HCP.

This HCP projects huge swings in harvest levels by County from one 5 year period to the next. Clearly, this does not provide certainty and predictability for the social programs funded by the counties and special districts. The only certainty is to wildlife habitat. How can we place our constituents in second or third position behind wildlife habitat.

As I mentioned earlier, 2 years ago when the HCP Business Case Analysis was brought to the BOF and FTLAC, I asked ODF, several times, to be placed on the HCP Steering Committee and/or the HCP Technical Committee and each time, I was told no without a reason provided. If the BOF was to move forward with the HCP, the forest products industry, environmental groups, and recreation interests all want a seat at the table, yet they are all stakeholders in this process. I am asking the Board of Forestry to allow me a seat at the table on the HCP Steering Committee and/or HCP Technical Committee, not as a stakeholder, but as your partner...one with a protected and recognizable interest. It is imperative that the trust counties are represented at the table when ODF and Paul Henson of US Fish & Wildlife negotiate harvest levels moving forward.

This current iteration of the HCP over weights conservation versus social benefits to rural communities and I dare say that if I had been allowed on the HCP Steering Committee by the Dept 2 years ago as requested, I feel the outcome of the HCP would be different today. If the BOF were to move forward with the HCP, I ask the Board to make a firm commitment to the trust counties to set the current harvest levels and financial outcomes in this HCP as a base minimum. An HCP must provide financial certainty to the Dept and a fair return on the investment made by the trust counties many decades ago.

It is clear that the current iteration of the HCP has many more problems than solutions and the solutions developed place the people of Oregon in second or third position to wildlife habitat. I will close with one additional, yet primary, consideration. It seems the Dept is asking the trust counties to lend support to an HCP that violates the State's contractual obligations to the trust counties and greatest permanent value. It is also abundantly clear that the current iteration of the HCP does not meet these contractual obligations.

Respectfully submitted,

David Yamamoto

Tillamook County Commissioner
Chair, Council of Forest Trust Land Counties
Chair, Forest Trust Lands Advisory Committee



October 1, 2020

VIA EMAIL (boardofforestry@oregon.gov)

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

Re: Board Discussion and Decision on Continuing the Habitat Conservation Plan

Chair Imeson and Members of the Oregon Board of Forestry:

Thank you for this opportunity to provide feedback and seek comment on continuing the process of pursuing a Habitat Conservation Plan (HCP) for the state trust lands in Western Oregon. As you know, Washington County is home to over 45,000 acres of forest that are managed by the state and those acres provide income, jobs, recreation, and conservation opportunities for the county, community members and visitors. Therefore, decisions as to the management of this vital resource have impacts on the County.

On April 2, 2013, the Washington County Board adopted the Resolution and Order number 13-27. That Resolution and Order states that the county “endorses efforts by the Oregon Department of Forestry and the Board of Forestry to implement conservation areas on state forest lands, including the Tillamook State Forest and encourages the state’s policy makers to pursue a sound forest policy that acknowledges the value and benefits of all forest resources including clean water, adequate fish and wildlife habitat, sustainable timber harvest, and recreation.” Our current Board continues to support that position.

In addition to aligning with the Washington County’s support for a comprehensive forest policy, an HCP can provide clarity for all stakeholders related to how and where timber sales will take place. That transparency is accompanied by a reduction in the cost to the Department of Forestry to finalize timber sales through a reduction of survey work needed to support the decision to harvest. An HCP lasting at least 70 years allows all stakeholders to focus investments and can create a smoother, better-regulated process. In finalizing an HCP with the federal government, the Department would create a long-term solution to the ongoing management needs of these important lands.

Board of County Commissioners

155 North First Avenue, Suite 300, MS 22, Hillsboro, OR 97124-3072

phone: (503) 846-8681 • fax: (503) 846-4545

The Board of Forestry is at a critical point in the process in pursuing an incidental take permit for the large areas of forest lands that the state manages in Western Oregon. Today's decision by your Board will commit the state, partner counties, and other stakeholders to an extensive public process through a National Environmental Policy Act (NEPA) review process.

The Washington County Board of Commissioners supports the Board of Forestry to continue the process of finalizing a Habitat Conservation Plan and looks forward to continuing to engage the Department of Forestry and Board of Forestry as it goes through the NEPA public process.

Sincerely,
Washington County Board of Commissioners



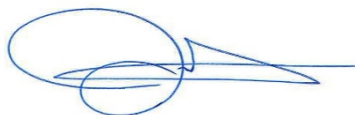
Kathryn Harrington, Chair
Washington County Board of Commissioners



Dick Schouten, Commissioner
Washington County Board of Commissioners



Pamela Treece, Commissioner
Washington County Board of Commissioners



Jerry Willey, Commissioner
Washington County Board of Commissioners



Roy Rogers, Commissioner
Washington County Board of Commissioners



**CONFEDERATED TRIBES OF
COOS, LOWER UMPQUA AND SIUSLAW INDIANS**

1245 Fulton Avenue - Coos Bay, OR 97420

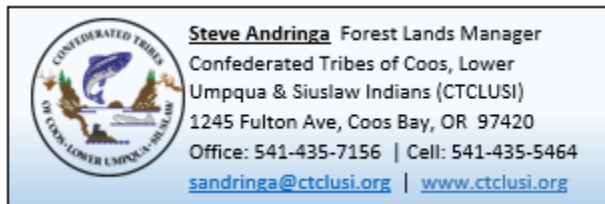
Telephone: (541) 888-9577 Toll Free: 1-888-280-0726 Fax: (541)888-2853

October 6, 2020

Thank you for the opportunity to provide some comments on ODF's Western Oregon State Forests Habitat Conservation Plan. I am Steve Andringa, the Forest Lands Manager for the Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians and I am here with my Tribe's blessing to provide some feedback on the HCP.

We fully appreciate and understand the purpose of an HCP - to establish long-term commitments for the protection of species while maintaining a level of economy for working forestlands.

The Confederated Tribes value all species and not just those listed as threatened or endangered, one such species being the Pacific Lamprey so culturally important to us. As we began our discussions on the HCP, we were encouraged about the potential to work with ODF on projects to protect and enhance culturally important species. We are thankful for the opportunity to participate in the general public meetings, and especially appreciative of ODF who met with us (virtually of course) this past August to discuss the HCP with our Tribal Leadership, Directors and staff in an open and transparent manner. We have been pleased with ODF's Division Chief, Liz Dent, as well as her staff, in reaching out to us in early engagement of the Plan. Our Tribal Leadership and staff look forward to our continued involvement with this process. We believe the HCP can provide for the necessary protection of species while balancing the need to maintain the State's working forestlands. Thank you.





October 2, 2020

VIA email: boardofforestry@oregon.gov

Oregon Board of Forestry
2600 State St.
Salem, OR 97310

Re: HCP Board Decision

Dear Members of the Oregon Board of Forestry,

I write to you concerning the proposed Habitat Conservation Plan (“HCP”) for western Oregon state forests. I am the Chief Executive Officer of Hampton Lumber, a family-owned forest products company with four sawmills in northwest Oregon, and nearly 800 employees who predominantly live and work in rural Oregon. Hampton’s sawmills rely heavily on harvest volumes from state forestlands. It is out of concern for those sawmills and the rural communities they support that I wish to express alarm at the process the Oregon Department of Forestry (“ODF”) has employed to develop the analysis before you today. Though ODF has not permitted adequate time to conduct a thorough analysis of its assumptions and methodologies, we have reason to believe there are fundamental errors that are skewing the results. Without time to ground truth the modeling, we do not believe the Board of Forestry is in a position to proceed with a decision on October 6. We are also frustrated that ODF has refused to develop an alternative that would be financially viable. I discuss each of these points in turn below.

A Defective Process

On July 13, 2020, ODF shared with stakeholders for the first time information concerning certain conservation measures and modeled outputs under the proposed HCP. ODF described at a high level “Riparian Conservation Areas” (“RCAs”) with certain buffer widths, and “Habitat Conservation Areas” (“HCAs”) that would be managed for habitat development and retention. At that time, ODF anticipated that the RCAs would encumber 12% of the permit area, and the HCAs would cover 46% of the permit area, for a combined total of 315,000 to 331,000 acres. ODF’s model projected an average harvest volume over 70 years of 196-206 MMBF.

Permit Area	196 to 206 MMBF
North Coast	146 to 153
Willamette Valley	30 to 32
Southern Oregon	20 to 21

Figure 1: Modeled Harvest Volumes as of July 13, 2020

However, ODF’s presentation revealed nothing concerning the management allowed within the HCAs, nor anything about the management regime outside of the HCAs other than that there would be RCAs. Neither was there any indication of where these HCAs would be located within state forests. Stakeholders were left with nothing other than acreage totals and harvest outputs, with no way to verify or validate either. Neither did ODF indicate the degree to which those harvest volumes would deviate from the average, nor the slope of the harvest curve over time. We were left only to observe that the modeled outputs fell far short of the modeled harvest volumes that underpinned the 2018 Business Case Analysis, which projected harvest volumes under an HCP of approximately 240 MMBF and climbing over time.

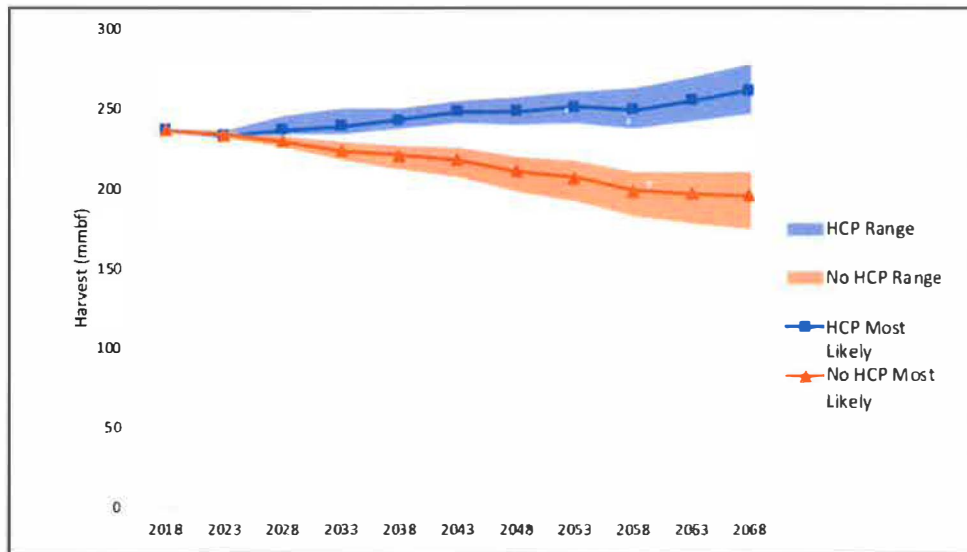


Figure 2: 2018 ECONorthwest Business Case Analysis

Why had the harvest volumes fallen 44-34 MMBF through the course of ODF’s negotiations with the services? Without more information, we could not know.

On August 6, ODF held a meeting with stakeholders where it revealed more about the HCAs and RCAs, including a calculation that the combined HCAs and RCAs would encumber 49-52% of the permit area, and that the vast majority of them would be located in the North Coast permit area (near Hampton’s sawmills).

Total Combined Draft HCA and RCA
(to nearest 1,000 acres)

Permit Area	315,000 (49%) to 331,000 (52%)
North Coast	250,000 (50%) to 261,000 (52%)
Willamette Valley	38,000 (45%) to 41,000 (48%)
Southern Oregon	27,000 (51%) to 29,000 (54%)

Figure 3: Management Restrictions as of August 6, 2020 (not available online)

However, other than a few examples presented without context, ODF was unwilling to reveal mapped HCA extent or location. For example, see the maps shown below that ODF shared for the “Windy Block” and the “Barber Block,” wherever those may be located.

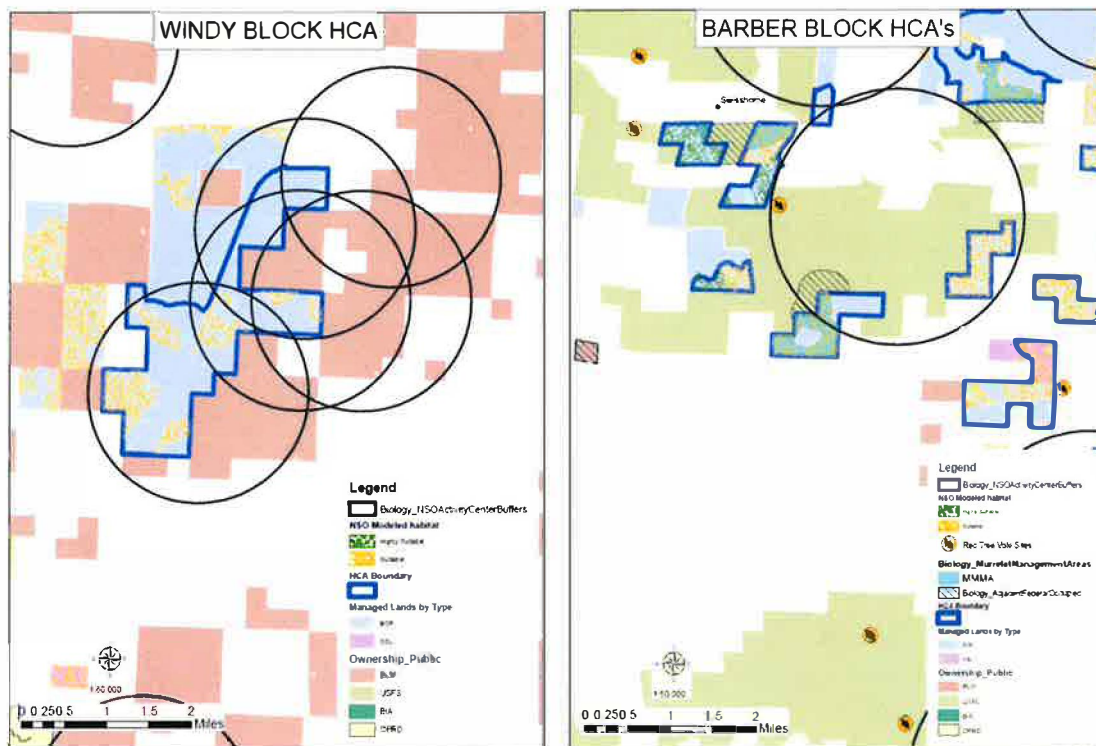


Figure 4: Mapping from August 6, 2020 (not available online)

ODF indicated that management inside the HCAs would be exclusively for habitat retention and recruitment, and that there would be no revenue objectives. While there would be a limited amount of restoration activity for diseased and hardwood dominated stands, ODF did not describe the pace of restoration activities either within or outside of the HCAs. Neither did ODF describe the nature of the management nor any harvest constraints outside of the HCAs. Instead, ODF offered the same harvest projections that were shared on July 13, but offered narratively that they had since made some “adjustments” to the HCAs and that the average volume “will

come up a little bit.” At that point, ODF shared that any departure from the average harvest volumes would be constrained to +/- 10%. ODF did not reveal a harvest curve, the slope of the curve, or offer any means by which the modeled harvest volumes could be validated.

On September 16, less than three weeks before the Board’s decision, ODF revealed more comprehensive modeling results. ODF explained that it had settled on a total HCA and RCA encumbrance at the lower end of the total acres projected on August 6 (317,000 versus the August 6 projection of 315,000-331,000), but that the average harvest volume had increased *above the upper bound* previously projected (averaging 225 MMBF over the permit term instead of 196-206 MMBF described on August 6).

Total Combined HCA and RCA (to nearest 1,000 acres)

Location	HCAs	RCA (inside/outside HCAs)	Total (% of Permit Area)*
Permit Area	239,000	37,000 / 41,000	317,000 (50%)
North Coast	186,000	31,000 / 35,000	252,000 (39%)
Willamette Valley	30,000	4,000 / 4,000	38,000 (6%)
Southern Oregon	23,000	2,000 / 2,000	27,000 (4%)

Figure 5: Management Restrictions as of September 16

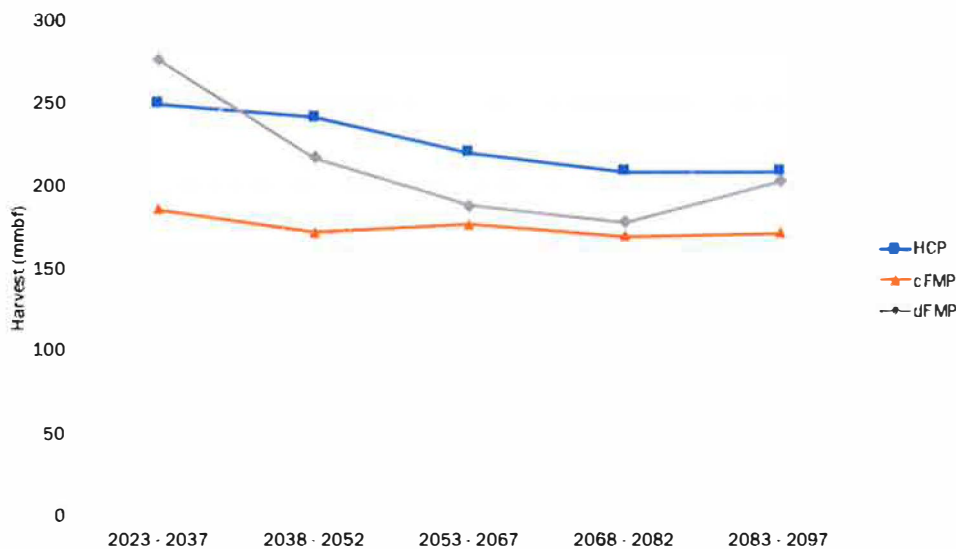


Figure 6: Harvest Modeling as of September 16

In the end, ODF settled on a total acreage encumbrance within the range initially projected, but then increased the projected harvest volumes 20 MMBF higher than the initial upper boundary. How was this possible? And why does the blue line above slope downward *when the same line in the business case analysis sloped upward*? ODF offered no detailed explanation nor any means of validating the modeled results.

Finally, ODF posted the actual model and relevant data underpinning its projections on September 24, only eight days before this comment deadline, and twelve days before the Board of Forestry meeting. The data posted on September 24 is the culmination of a massive modeling effort requiring many months to prepare. And ODF gave stakeholders, and the Board of Forestry, merely eight days to prepare comments and respond. This is not honest and transparent stakeholder engagement. We have been working feverishly to determine how ODF derived its results, and what changed between August 6 and September 16, but we simply have not had enough time to complete the work. Instead, we're left only with a great deal of skepticism informed by many decades of timberland management.

We Are Highly Skeptical ODF Can Produce the Modeled Volumes.

While we were not permitted sufficient time to ground truth ODF's modeling, the history of failed promises by federal and state agency forest management plans and the modeling of timber volume to be produced by those plans, makes us highly suspect of the results. The 1994 Northwest Forest Plan and the 2010 Oregon State Forest Management Plan are clear examples of agency plans based on assumptions and intentions that produced less harvest than was predicted. The persuasive notion of certainty and durability desired by stakeholders fell victim to legal and operational implementation challenges.

According to ODF's comparative analysis, under the HCP there would be approximately 277,000 acres outside the HCAs available for harvest (page 37), plus a limited amount of restoration activity within the HCAs of approximately 500 acres per year. At a 50-year average rotation age, 2% of those acres would be harvested per year, or 5,550 acres. During the first fourteen-year model period, ODF is projecting an average of 250 MMBF per year. In order to produce 250MMBF per year on 5,550 acres, each acre would have to produce 45 MBF at time of harvest. This is relatively high. In the first five year period of the HCP there are no acres of thinning indicated, yet in the second five year period 30.3 MMBF per year of thinning volume appears, only to be reduced to just 5.1 MMBF per year in the third five year period. A modeled forest management plan must be based on a sound and feasible implementation plan. Many state timber sales, which are usually much older, offer lower volumes. For example, the three most recent ODF timber sales in the Astoria District include Green Gold which was cruised at 43 MBF/acre, Sally Ridge at 42 MBF/acre, and Buck Shot at 47 MBF/acre (each of these calculated using "net acres" which excludes roads, riparian areas, and other restrictions). But these are premier harvest units on ideal ground. In the Tillamook District, the three most recent ODF timber sales were Smith & Archers at 33 MBF/acre, Old Bungee at 33 MBF/acre, and Cruisin Murphy at 30 MBF/acre. In our experience, the ODF average across the permit area will likely fall somewhere between these numbers (and toward the low end), and well below the 45 MBF/acre their modeled harvest volume would require. Even at a 10% deviation (or 6,105 acres per year), ODF harvest would have to average 41 MBF/acre. This is highly unlikely.

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Adding to our skepticism, the ODF acreage available for harvest appears to be severely handicapped. The image below shows most of the Tillamook and Forest Grove districts managed under the proposed HCP. The permit area in dark green is overlaid by the HCAs (orange), inoperable acres (pink) and RCAs (purple). The light green is the area outside the HCAs that is hardwood dominated or infected with Swiss needle cast.

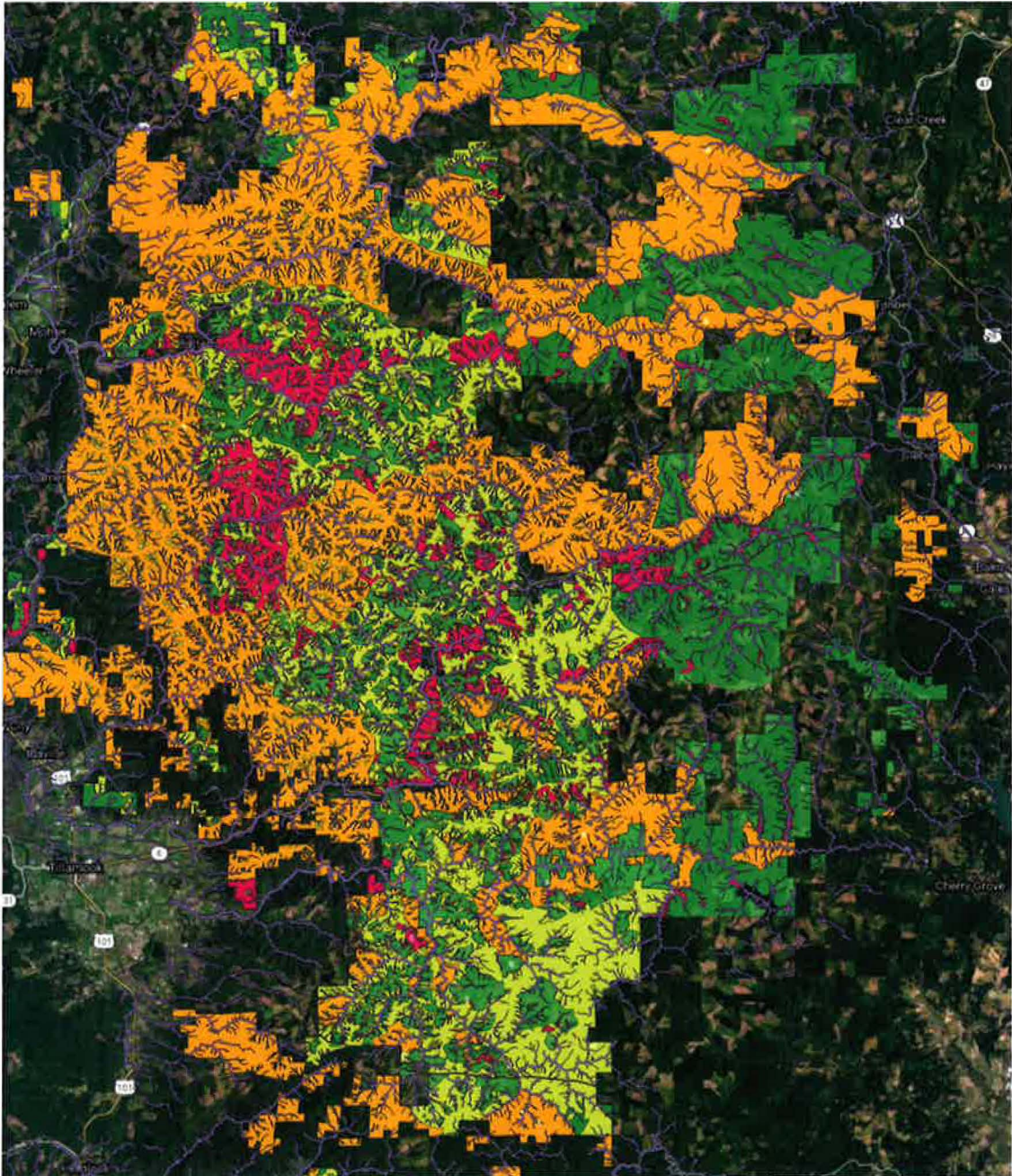


Figure 7: Tillamook and Forest Grove Districts Showing Swiss Needle Cast in Light Green

As is evident, a large proportion of the area “available for harvest,” is compromised. In fact, as of ODF’s August 6 meeting, ODF revealed approximately 133,000 acres of the permit area are

infected with Swiss needle cast. Approximately 82,000 of the 133,000 acres infected are outside of the HCAs, or approximately 30% of the lands available for harvest, and 25,000 acres outside the HCAs would be hardwood dominated, or 9%. This means that well *more than a third* of the acreage available for harvest will cut out at *much lower volumes* than the 41-45MBF/acre required to meet the projected 250 MMBF/year ODF is modeling in the first fifteen year period. We cannot understand how ODF has arrived at its modeled numbers, and ODF has left no time to inform our understanding prior to the comment deadline.

The Draft FMP Analysis Overestimates Future ESA Encumbrances

While we believe the ODF model significantly overestimates the harvest volumes that will be produced under the HCP, we believe that ODF also *under*-represents the harvest volumes that would be produced under the draft FMP. The maps below show the Clatsop State Forest with the permit area again in green. The image on the left shows current threatened and endangered species habitat in purple. The image on the right is an ODF prediction of what habitat threatened and endangered species will occupy by the end of the permit term under the draft FMP.

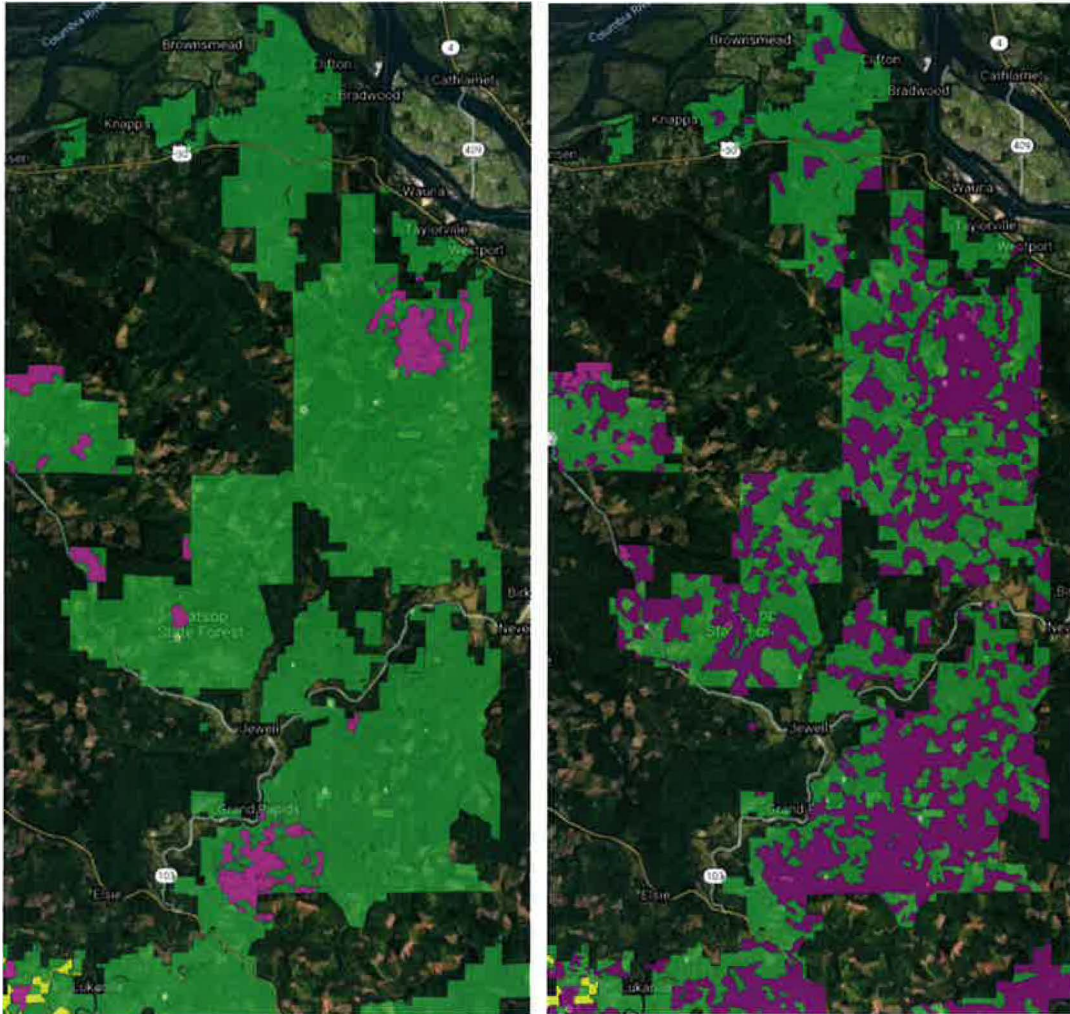


Figure 8: Clatsop State Forest T&E Species Encumbrances

We struggle to understand how ODF could possibly draw the map on the right. The predictions concerning future listings, and what they will require (particularly with regard to red tree voles), appear to us to be wildly overestimating future encumbrances. While ODF has not permitted sufficient time to understand in any detail how these projections were derived, the biologists we have consulted are highly skeptical of these maps. Moreover, no responsible landowner would continue to grow the habitat that recruits that kind of occupancy. It would drive forest harvest to zero, much like we see today on the Elliott State Forest.

It appears to us that ODF has artificially deflated harvest volumes under the draft FMP by presuming huge ESA encumbrances, making the HCP relatively more attractive. We do not believe this is a reasonable presumption.

ODF Has Handicapped the Draft FMP

At the time the business case analysis was prepared, and ODF embarked on the HCP review process, we had hoped that ODF would produce a true take avoidance strategy to contrast against the HCP. Such a strategy would have taken steps to preserve operational flexibility while avoiding take. To the contrary, the draft FMP prepared by ODF would continue growing habitat in abundance without any incidental take protection. As highlighted above, this is a highly irresponsible management strategy. In developing the draft FMP, ODF did not significantly deviate from any of the large restrictions on management under the current FMP (and for this reason the modeled outcomes are nearly identical). For instance, the ODF model appears to commit vast swaths of the forest to “landscape design,” including the current terrestrial anchors, and totaling over 217,000 acres or 34 percent of the permit area. None of that is required by the Endangered Species Act. When inquiring with agency staff why they would make these costly commitments, we were told that these are requirements of “Greatest Permanent Value.” Of course, a Linn County judge has roundly disagreed with that assessment, to the tune of more than a billion dollars in damages.

We cannot understand why ODF did not actually prepare a “take avoidance” alternative, or even an alternative that would be financially viable.

The Proposed HCP Is Decidedly Unaffordable

ODF published with its comparative analysis of the various alternatives projections of annual net operating income for ODF after revenue distribution to the counties. The graphic below shows huge annual losses under all three alternatives.

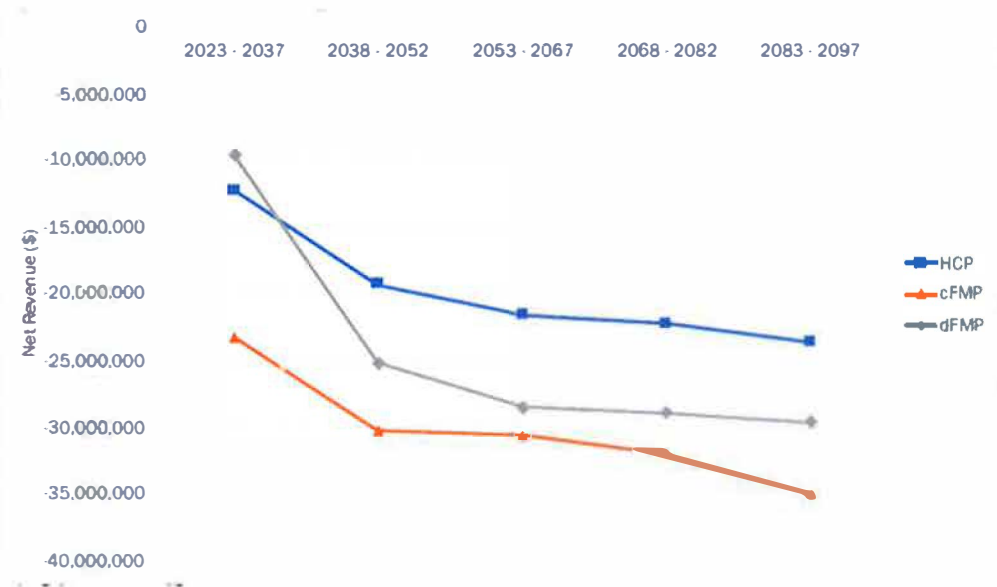


Figure 9: Comparative Analysis Annual Net Operating Income

Where does ODF intend to find the money to support this kind of management? There are presently huge demands on state general fund dollars, and the curves above represent tens of millions of dollars annually that would otherwise be going to school children or other programs helping people in need. There are many forests in the Pacific northwest that are managed *profitably* under HCPs in full compliance with every relevant law. We do not understand what makes ODF's forests so different. In our experience, ODF's 36.25% revenue share should be more than enough to cover costs in management of a financially unencumbered forest exceeding 600,000 acres.

The HCP Commits to Conservation Much More Than Required

Maybe most disappointing to us, it appears that ODF has committed to conservation more than any other forestland HCP we can find, and even more than the federal wildlife agencies have required. The following page includes a summary of the various Pacific Northwest forestland HCPs prepared for us by Cascade Environmental Group (and prior to the most recent round of modeling). You will see that with respect to management within the RCAs, and the size and extent of the HCAs, the ODF proposed HCP is decidedly the most onerous, exceeding even the HCP covering forestlands managed by the Washington Department of Natural Resources.

	Oregon Department of Forestry Western Oregon State Forestland HCP	Green Diamond California Timberland HCPs	Port Blakely Oregon Forest Practices Stewardship Agreement and HCP	Sierra Pacific Land & Timber Companies HCPs	State of Washington Forest Practices HCP	State of Washington DNR HCP
Summary	The Western Oregon State Forest HCP is in development. The proposed aquatic strategy covers 4 salmon and steelhead species, Eulachon, and 2 riparian-dependent amphibian species. The terrestrial strategy covers Northern spotted owl (NSO), Marbled murrelet, coastal marten, red tree vole, and Oregon slender salamander. The HCP area is approximately 636,000 ac	The Aquatic/Riparian HCP was completed in 2007. The terrestrial HCP (2018) and Aquatic HCP cover approximately 365,152 ac of timberland in northern California. Aquatic HCP: enhances habitat for six native fish and amphibians. Terrestrial HCP: enhances and protects habitat for four species	The 2020 agreement covers about 30,000 ac in Clackamas County, Oregon. Under the stewardship agreement, the company will exceed ODF forest practice rules for long-term regulatory efficiency and certainty. The conservation measures will improve habitat for aquatic life, listed fish species, NSO, and other wildlife. The company is developing a complementary multi-species HCP	A 2020 agreement for an ESA incidental take permit (ITP) on 355,061 ac and enhancement of survival permit (ESP) for 211,824 ac. The ESP authorizes future take of salmonid species that NMFS proposes to reintroduce. The company will continue to comply with the California Forest Practice Rules, as well as additional road inventories and actions, effectiveness, implementation and compliance monitoring, and habitat improvements. The company is applying to the USFWS for a terrestrial wildlife ITP covering NSOs and California spotted owls (CSOs), encompassing 1,565,707 ac	The 2005 agreement is a programmatic HCP linked to Forest Practices Rules for private forestlands. The HCP provides compliance with the ESA for aquatic and riparian-dependent fish and amphibian species on 9.3 million ac of non-federal forestlands. The programmatic HCP goals are focused on ESA compliance for aquatic species and compliance with the Clean Water Act. Terrestrial Wildlife is not covered under the HCP	The Washington Department of Natural Resources (DNR) completed the HCP in 1998. The total area of trust lands covered by the HCP is approximately 1,630,000 ac, and includes west-side and east-side forests. The HCP provides mitigation for incidental take permits for two federally listed species, the NSO and marbled murrelet. The HCP also conserves habitat for salmonids and other unlisted species in western Washington for which DNR developed unlisted species agreements. (At the time of the HCP ITP approval there were no listed salmonids).
Riparian Harvest?	No (only with specific authorization)	Yes	Yes	Yes (follows current forest practices rules)	Yes	Yes
Total Habitat Conservation Area Size and Distribution	<p>Entire Permit Area:</p> <ul style="list-style-type: none"> - Combined Habitat Conservation Areas (HCAs) and Riparian Conservation Areas (RCAs) encumber 49% to 52% of the landscape - RCAs cover approximately 12% of the permit area - RCAs and HCAs overlap: 46% of the RCAs are within HCAs 	<p>Entire Permit Area:</p> <ul style="list-style-type: none"> - Combined RMZs and geologically unstable areas encumber over 25% of the permit area through extremely limited or no timber harvest - Additional protected areas: no-harvest or limited-harvest static reserves around select NSO sites and high-value habitats - Protect nine large static terrestrial reserves ranging in size from approximately 3,700 to over 16,000 ac, and totaling approximately 72,000 ac (an additional 20% of the permit area) 	<p>Entire Permit Area:</p> <ul style="list-style-type: none"> - The existing leave areas within riparian areas combined with the older age class of the managed landscape comprise 21% of the forested stands, nearly all of which are less than 70 years of age - Additional protected areas related to harvest units will be developed - Upland habitat patches will be mapped and function as reserves for the life of the plan 	<p>Entire Permit Area:</p> <ul style="list-style-type: none"> - Combined NSO and CSO Potential Habitat Area (PHA) is anticipated to increase on company lands from 37.6% (589,643 ac) at the beginning to 72.5% (1,135,607 ac) by the end of the 50-year permit term - Tier 1 NSO Activity Centers receive the highest level of protection. A total of 11,762 ac of the company Covered Lands would be retained with no harvest within this area for the duration of the permit (regardless of occupancy status) with the exception of trees damaged during high severity wildfire 	<p>Entire Permit Area:</p> <ul style="list-style-type: none"> - Statewide: Of the 9,124,595 ac total covered lands (western and eastern Washington), there are 2,065,451 ac in combined riparian zone and unstable slope areas (22.6%) - In western Washington: Of the 6,072,043 ac covered lands, 1,335,771 ac are in riparian areas (22.1%) and 358,251 ac in unstable slope areas (5.9%). The combined area in these protection categories is 1,694,022 ac (28.0%) 	<p>Entire Permit Area:</p> <ul style="list-style-type: none"> - 31% percent of DNR-managed lands on the west side will be in the complex forest habitat category at year 2096 - This estimate includes riparian areas, unstable slopes, and murrelet sites, as well as habitat provided for NSO

Why would ODF make such enormous commitments? Why would that be required when no other forestland HCP has required half of the land ownership committed to species habitat, and significant set-asides and management constraints in the rest?

Maybe more revealing of the degree to which ODF was motivated to make conservation commitments exceeding legal requirements, the draft HCP includes the following table:

Table 4-7. Acres of Modeled Suitable or Highly Suitable Covered Species Habitat in Habitat Conservation Areas

Species	Habitat in Permit Area at Beginning of Permit Term	Habitat in HCAs at the Beginning of Permit Term	% of Total in Permit Area	Habitat in Permit Area at End of Permit Term	Habitat in HCAs at end of Permit Term	% of Total in Permit Area	HCP Commitment to Conserve, Maintain, and Enhance Habitat ^b
Northern spotted owl ^a	42,000	31,000	72%	197,000	180,000	91%	130,000
Marbled murrelet	16,000	15,000	93%	160,000	148,000	92%	95,000
Red tree vole	37,000	31,000	85%	159,000	147,000	93%	90,000
Oregon slender salamander	23,000	17,000	74%	27,000	19,000	73%	16,000

^a 28 out of 31 active northern spotted owl nest sites are inside of HCAs

^b Commitments to conserve, maintain, and enhance acres of covered species habitat were estimated based the assumption that within the permit term 50% of highly suitable habitat and 80% of suitable habitat could be achieved in the permit area (primarily inside of HCAs)

Figure 10: Draft HCP Habitat Commitments

The far-right hand column appears to represent the commitment to the federal wildlife services to conserve, maintain, and enhance habitat. For each of the three major listed species, the projected habitat in the permit area at the end of the permit term vastly exceeds the requirement. For instance, the northern spotted owl habitat commitment is 130,000 acres, and ODF projects the habitat at the end of the permit term will equal 197,000 acres, meaning ODF’s management is projected to produce *fifty percent more habitat than required*. Similarly, for marbled murrelet, ODF’s management is expected to produce nearly *seventy percent more habitat than required*. If that is indeed the habitat commitment, why would ODF management target such spectacular exceedances? Why can’t somewhat less acreage be committed to conservation while still meeting the requirements of an HCP? What reasonable interpretation of “greatest permanent value” could possibly require that?

Conclusion

In conclusion, we believe we have good reason to be skeptical of the relatively high harvest volumes under the proposed HCP, and the relatively low harvest volumes under the draft FMP. Unfortunately, ODF has allowed no time for the inquiries that would resolve the issues above, much less move the stakeholders toward some kind of agreement. We acknowledge that ODF is attempting to put in front of you a “*relative analysis*” that merely contrasts the alternatives without making firm projections. But when the HCP harvest volumes appear to be overinflated, and the draft FMP harvest volumes intentionally suppressed, we strongly question

whether you have before you sufficient information to make a decision on whether to proceed. At the very least, it seems more time would be warranted before pulling the trigger on the gargantuan task of NEPA analysis and Section 7 consultation. We cannot understand why this decision must be made in October.

Moreover, we continue to be frustrated that ODF refuses to profitably manage the forest, and evidently expects that the Oregon legislature will subsidize its management toward a conservation-oriented interpretation of “greatest permanent value” that exceeds even the requirements of the federal wildlife agencies. We strongly believe that this forest can be managed in a manner that meets all legal requirements, including to conservation, the counties, and recreation, without losing money to the tune of tens of millions of dollars per year.

We urge you to look harder at the work ODF has put before you. Ask questions. And please take the requisite time. The ODF staff recommended action is for the Board of Forestry to direct staff to finalize the administrative draft HCP and move into the NEPA process. As outlined in the ODF staff report, this matter is not scheduled to come before you again until NEPA is completed and a record of decision is ready to issue. The Board must not consider this action as simply a check point in the process. ODF staff has repeatedly stated in recent public forums there are continuing changes and refinements necessary, minimizing the magnitude of potential changes from the current plan. After the years of time invested by the counties, stakeholders, public, ODF staff and this Board, we all deserve complete transparency and opportunity to fully analyze the HCP and modeled results. The HCP is a 70 year term that will have a significant impact on rural communities with millions of dollars at stake for those communities and the State of Oregon. With so little time to read the HCP, much less rigorously assess its presumptions and analysis, we are confident you are not in a position to make an informed decision on October 6 and ask for you to defer your decision until the November scheduled meeting. What could be more important on your November agenda than a more thorough analysis and discussion of the HCP?

Very truly yours,



Steve Zika
Chief Executive Officer



The League of Women Voters of Oregon is a 100-year-old grassroots nonpartisan political organization that encourages informed and active participation in government. We envision informed Oregonians participating in a fully accessible, responsive, and transparent government to achieve the common good. LWVOR Legislative Action is based on advocacy positions formed through studies and member consensus. The League never supports or opposes any candidate or political party.

October 2, 2020

To: Board of Forestry
Tom Imeson, Chair
1621 NE Broadway #224
Portland, OR 97232

Email: BoardofForestry@oregon.gov

Re: Habitat Conservation Plan – **Support**

The League of Women Voters of the United States believes that natural resources should be managed as interrelated parts of life-supporting ecosystems. Resources should be conserved and protected to assure their future availability. Pollution of these resources should be controlled in order to preserve the physical, chemical and biological integrity of ecosystems and to protect public health.

In addition, the LWV of Oregon supports the Land Conservation and Development's land use goals that promote the management of forest lands for both economic development and their value as natural resources. The state should have the prime responsibility for establishing statewide planning goals and for supervising and coordinating comprehensive land use plans, with participation by the public and by local and regional governments.

The Habitat Conservation Plan (HCP) appears to present a balanced approach to satisfying the federal requirement for protecting endangered species while permitting timber harvests on ODF-managed lands in equal measure. The Plan represents a compromise comparable to HCPs in other states that should satisfy both timber industry interests and those of the fish and wildlife conservation communities. For this reason, the LWVOR supports the HCP and recommends that the Board pass the HCP on to the National Environmental Policy Act (NEPA) review process, with the caveat that the details of the plan get further refinement from a balanced advisory group composed of all stakeholder groups.

The reasons we support the plan are as follows:

For the timber industry, it provides:

- Clear maps delineating what areas can be logged in the future that will allow for better planning of future operations and revenue expectations for 70 years,
- A degree of legal assurance for the timber industry that they are less likely to be subjected to future costly lawsuits for accidental takes.
- An ample number of acres of land that is available for harvest (about half the land) without concern about shrinking permit areas in the future.
- Financial stability for counties dependent on timber revenues with better volume and revenues than the current or draft Western Forest Management Plans (FMPs).
- The comparative analysis points to more land permitted for future timber harvests going forward in the Habitat Conservation Areas (HCAs) than with the take-avoidance schemes in the two FMP plans.
- Streamlined timber sale process to improve time to market and capture high market prices.

For Oregonians concerned with the conservation of wildlife and high-quality drinking water sources:

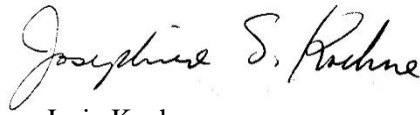
- HCAs preserve more contiguous areas (fewer patch areas) for the habitat protection for endangered species as required by federal law.
- Assures protection for streams, with wider buffers to keep streams silt-free and cool enough for fish, including the non-bearing streams that feed into them.
- Elimination of costly species surveys prior to timber sales and forest operations, which should free up ODF resources for monitoring and other adaptive management projects.
- More assured funding for ODF management through more consistent harvest volume and revenue.

The plan will no doubt be refined, and there will be time for additional public input to make improvements, but we urge the Board of Forestry to allow the HCP to continue on to the NEPA process along with a companion FMP. The plan lives up to ODF's obligation to manage for Greatest Permanent Value for now and in the future.

We appreciate the opportunity to submit our comments and hope they will be helpful.



Rebecca Gladstone
LWVOR President



Josie Koehne
LWVOR Forestry Portfolio

Cc: Oregon Global Warming Commission (Oregon.GWC@Oregon.gov)

Peter Dougherty, State Forester (Peter.daugherty@oregon.gov)

Liz F. Dent, State Forest Division Chief (Liz.F.Dent@oregon.gov)

Justin Butteris, ODF Policy Analyst (Justin.Butteris@oregon.gov)

**Statement of Mary Scurlock before the Oregon Board of Forestry
Regarding the Draft Western Oregon Habitat Conservation Plan**

October 6, 2020

I am Mary Scurlock, a consulting advisor to the Wild Salmon Center on state forests and coordinator of the Oregon Stream Protection Coalition on private forests. I also support a Board decision to finalize the administrative draft of the Western Oregon State Forests Habitat Conservation Plan.

The state's path to this moment has been a long one and the draft plan before you builds on a wealth of knowledge, including real-world experience about the costs and pitfalls of take-avoidance strategies.

I was among the cheerleaders for a state lands aquatic habitat conservation plan back in 1997 when then-Governor Kitzhaber first enunciated such a plan as his policy objective for an early iteration of the Oregon Plan for Salmon and Watersheds. I've remained a faithful if often discouraged fan of this elusive goal ever since, commenting on numerous failed precursors to the current effort. Meanwhile, state forests have been the focus of lawsuits, ballot measures, legislation, media investigations and a constant political football.

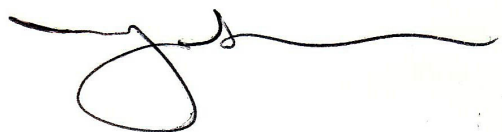
At long last, this draft plan holds the realistic promise of rationalizing management of the state-owned forests it covers.

I've been impressed by the constant attention to detail by Oregon Consensus, Kearns & West, Department staff and the entire project team; communication with stakeholders has been a high priority. The extra effort has paid off. As a result, I can say with high confidence that the draft plan you see today, while still incomplete, provides a solid foundation for a successful outcome: an approved and legally defensible habitat conservation plan. The decision being made today is far more complete, and more informed by transparent supporting analysis than any prior effort this Department has undertaken.

That is not to say that your work – or the work of aquatic conservation advocates -- is done here. Like the federal Services, we still see areas where the plan could benefit from greater clarity and detail prior to finalization of the state's application. Key topics include the technical analysis of aquatic conservation outcomes for riparian areas and associated unstable slope, details about roads management, and policy and legal analysis of the relationship between Endangered Species Act decision standards and water quality standards compliance obligations.

I am optimistic that these and other topics identified by the Services and EPA can be adequately addressed by further stakeholder communication around the basic framework provided by the draft plan. I urge you to move the planning process forward today.

Thank you for the opportunity to testify.



Mary Scurlock, M. Scurlock & Associates, Portland, Oregon
503-320-0712, mary.scurlock@comcast.net

September 29, 2020

Dear Chair Imeson and Board Members,

I am writing this letter on behalf of the Oregon Department of Forestry's State Forests Advisory Committee (SFAC). The SFAC is comprised of citizens and representatives of timber, environmental and recreation groups, and tribes. The purpose of the SFAC is to provide an open forum to discuss issues, opportunities and concerns, and offer advice and guidance to ODF on the implementation of the Northwest Oregon State Forests Management Plan.

The SFAC has been engaged in the initial discussions regarding the HCP with regular updates and has been invited to provide input at various stages. Members of the SFAC have also participated in the public meetings that have taken place throughout the past year.

On September 17, 2020, SFAC held a special meeting to discuss the HCP progress to date and provide input. At that meeting, we also elected to ask each member whether they supported moving forward with the HCP process and what issues and questions they have.

I would like to state that as a general rule, this group works on consensus. For the purposes of this letter, there was no consensus. Six members voted yes to move forward, three voted no, and one member abstained. The "vote" is less important than the discussion that occurred and I would like to offer their thoughts to you for your consideration.

All of the members of the committee expressed the need for more information. For some, this was a reason to move forward, for others it was a reason to stop the process now. But, based upon the conversation that took place, it was clear that there are still a lot of unknowns and should the board elect to continue the process, continuing engagement with the SFAC and the public to clearly lay out the information gaps will be critical.

There were also concerns raised about the impacts to the sustainability of the funding for ODF. Again, members on all sides of the issue are aware of the fiscal challenges that ODF has and continues to face. If the board elects to continue the process, it should be done in concert with continuing efforts to diversify the funding streams and sources to ensure a fully functioning department.

For the members who voted no to recommending moving forward with the HCP, two of the key points of concern were the lacking managed forest timber volume, as well as impacts to local governments and special districts that receive income from timber sales and that ODF would not be able to fulfill their commitments to those jurisdictions under the HCP.

For members who voted yes to recommending moving forward with the HCP, two of the key points were the certainty that an HCP would provide to the department for the long term, and

the adaptive management strategies built into the plan that would allow flexibility to adapt to changes in environmental and social needs.

We understand this is a complex situation and that the Board has to balance multiple perspectives and interests. I believe the SFAC is a body that is comprised of many of those perspectives and would encourage you to consider the committee as sounding board and resource for this and other issues surrounding the implementation of managing our state forests.

Thank you for your consideration,

Lisa M Phipps

Lisa M Phipps
SFAC Chair

SENATOR FRED GIROD (R-LYONS)
SENATE REPUBLICAN LEADER



SENATE REPUBLICAN OFFICE

September 22, 2020

Chair Tom Imeson
Oregon Board of Forestry
2600 State Street
Salem, Oregon 97310

Dear Chair Imeson and Members of the Board of Forestry;

As I write this, beloved communities in Oregon have gone up in smoke. Oregonians who have already lost everything during the COVID-19 political pandemic are losing even more; their homes, land, animals, or maybe their lives, as fire swept through Oregon at breakneck speed.

Focusing on policy is exactly what legislators and stakeholders should be doing to invest in the future of this state. Further, as a legislator from Lyons, one of the communities devastated during the current fires, I prefer to use idle hands for action.

On behalf of the Oregon Senate Republicans, the purpose of this letter is to outline concerns with the Oregon Department of Forestry (ODF) proposal to dramatically decrease timber harvests in state forests with its newest draft Habitat Conservation Plan (HCP).

ODF is moving forward with securing a 70-year HCP that proposes to turn more than 50 percent of working state forestland (331,000 acres) into a wildlife reserve, which will reduce harvests on the north coast forests by 25-30 percent from current levels. ODF already limits harvesting, leaving roughly half the annual growth of Oregon forests untouched and ready to burn.

If our state is truly interested in a climate mitigation plan, we should be looking at ways to decrease carbon emissions from wildfires through better active management of our public lands, not more hands-off management. One large wildfire season, like the one we're experiencing right now, can emit twice as much carbon pollution as all the cars in Portland emit in one year.

Hundreds of thousands of acres have burned this fire season. The HCP is reckless and shockingly tone deaf as it makes our state forests mimic federal forests. We cannot afford more ineffective forest management that puts our state and its citizens in increasing fire danger.

Estimates project that this HCP will result in approximately \$30 million per year of lost revenue to the state and rural counties, not to mention hundreds of millions of dollars in lost income and opportunities for local businesses. At a time when the state budget is billions of dollars in the red, the draft HCP will leave ODF roughly \$10 million short per year and such a budget shortfall will require ODF to compete with education and social programs for General Fund revenue. This, on top of our existing hardship, is something we cannot afford.

SENATOR FRED GIROD (R-LYONS)
SENATE REPUBLICAN LEADER

The impacts of this fire season will be felt by generations to come. The true costs – economically, environmentally, socially, emotionally – are unimaginable.

This HCP needs to be redrafted to reflect a more balanced approach that favors active management of our precious resources. Our forests are a natural renewable resource. Now is the time to consider what is best for Oregon, not special interests.

Sincerely,

A handwritten signature in cursive script that reads "Fred Girod".

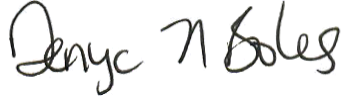
Senator Fred Girod
Senate Republican Leader

Senate Republican Caucus Signatures on Next Page:

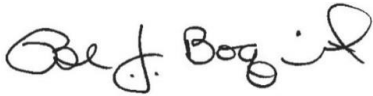
SENATOR FRED GIROD (R-LYONS)
SENATE REPUBLICAN LEADER



Senator Herman Baertschiger, Jr.



Senator Denyc Boles



Senator Brian Boquist



Senator Lynn Findley



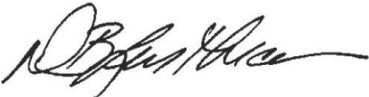
Senator Bill Hansell



Senator Dallas Heard



Senator Tim Knopp



Senator Dennis Linthicum



Senator Alan Olsen



Senator Kim Thatcher



Senator Chuck Thomsen



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
West Coast Region
1201 NE Lloyd Boulevard, Suite 1100
PORTLAND, OR 97232-1274

September 16, 2020

Peter Daugherty
State Forester
2600 State Street
Building B
Salem, Oregon 97310

Dear Mr. Daugherty:

NOAA Fisheries has cooperated with the Oregon Department of Forestry (ODF) and other state and federal agencies for the past several years in the development of a draft Western Oregon Habitat Conservation Plan (HCP). This letter is to state our support of the collaborative process, communicate our continued commitment of resources, and our assent to lead the National Environmental Policy Act (NEPA) process.

We acknowledge ongoing work remains on issues such as pesticides, road management, and beaver management in order to complete the draft HCP. That said, we support the work completed to date and are committed to working with ODF to address areas needing further refinement. We recognize there are trade-offs to species and their habitats and the forest management program. Our objective is to work with ODF to arrive at an HCP that meets conservation and management targets, is implementable, and is legally defensible. We are confident that the collaborative process can result in a draft HCP that meets these objectives.

We encourage the Board of Forestry (BOF) to support the completion of the draft HCP and request initiation of the NEPA process. Should the BOF give the approval, we are ready to engage with ODF to complete the draft HCP and ensure a smooth transition into the NEPA process.

The NEPA process begins with receipt of a complete HCP and permit application. At that time, we conduct scoping which can include written comment, public meetings (in compliance with COVID-19 guidance), and possible other community outreach. Public comments are incorporated into the NEPA analysis. We will work closely with ODF during our NEPA process.

The NEPA process has several decision points along the way. If the BOF decide to move forward with the HCP, we would like to identify these points for ODF to allow for input and technical assistance in the federal process. Although NOAA Fisheries will be the official lead, this will be a joint effort between the State, the U.S. Fish and Wildlife Service, and NOAA Fisheries. Attached please find a diagram of NOAA Fisheries' West Coast Region HCP NEPA process.



To summarize, we appreciate the collaborative efforts of the HCP team and look forward to continuing the HCP development process leading to the issuance of the incidental take permit. If you have any questions about the HCP, NEPA, or NOAA Fisheries, please contact Tere O'Rourke (541-243-3902 or therese.orourke@noaa.gov) or Jim Muck (541-784-7225 or jim.b.muck@noaa.gov).

Sincerely,

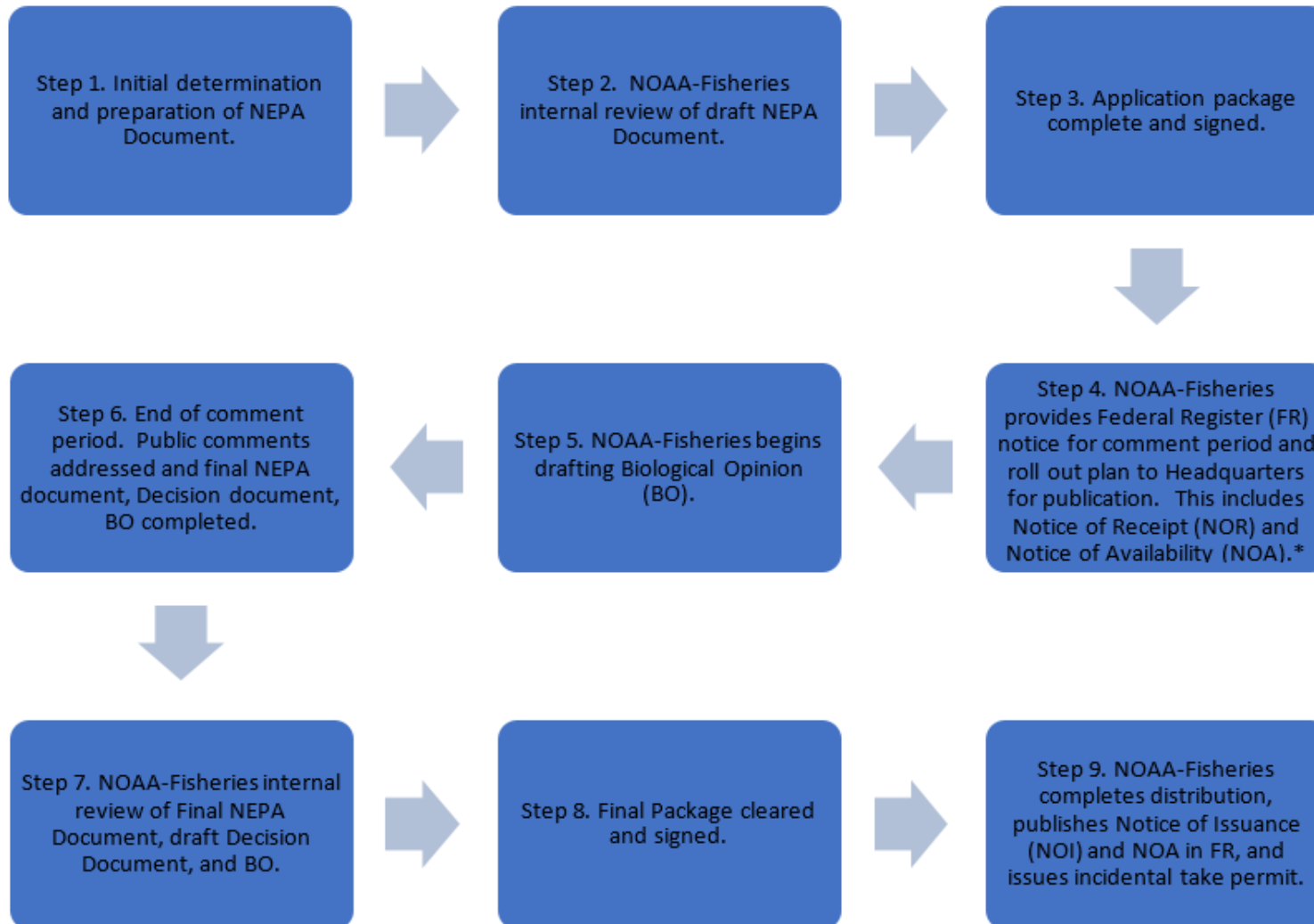
A handwritten signature in blue ink, appearing to read "Kim W. Kratz", is placed over a light blue rectangular background.

Kim W. Kratz, Ph.D
Assistant Regional Administrator
Oregon/Washington Coastal Area Office

Attachment

cc. Liz Dent
Brian Pew
Cindy Kolomechuk

Habitat Conservation Plan/Incidental Take Permit - NEPA Clearance Process



Habitat Conservation Plan/Incidental Take Permit NEPA Clearance Process

- Step 1. Initial determination and preparation of NEPA Document.
- Step 2. NOAA Fisheries internal review of Draft NEPA Document.
- Step 3. Application package complete and signed.
- Step 4. NOAA Fisheries provides Federal Register (FR) notice for period and roll out plan to Headquarters for publication. This includes Notice of Receipt (NOR) and Notice of Availability (NOA). Under most circumstances, the draft HCP and draft NEPA Document are issued together for public comment.
- Step 5. NOAA Fisheries begins drafting Biological Opinion (BO).
- Step 6. End of comment period. Public comments addressed and final NEPA Document, draft Decision Document, BO completed.
- Step 7. NOAA Fisheries internal review of Final NEPA Document, draft Decision Document, and BO.
- Step 8. Final Package cleared and signed.
- Step 9. NOAA Fisheries completes NEPA document distribution, publish Notice of Issuance (NOI) and NOA in FR, and issues incidental take permit.

*Note: This flowchart is intended as a general guide and does not reflect all of the steps for the NEPA process.



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Oregon Fish and Wildlife Office
2600 SE 98th Avenue, Suite 100
Portland, Oregon 97266
Phone: (503) 231-6179 FAX: (503) 231-6195

Reply To: ODF WF HCP Needs.docx
TS Number: 20-594

Peter Daugherty, State Forester
Oregon Department of Forestry
2600 State Street, Bldg. C
Salem, OR 97310

Dear Mr. Daugherty:

The Service has been working with the Oregon Department of Forestry (ODF) on the development of their Western Forests Habitat Conservation Plan (HCP) beginning in 2017, and we have been able to review preliminary draft chapters of the HCP. Overall, we support the direction of the conservation strategies that are being developed and the general locations and configurations of the Habitat Conservation Areas (HCAs) and the Riparian Conservation Areas. We appreciate the good work done by ODF and your consultants, and we think both the Scoping and Steering Committees, respectively, have established a productive and collaborative planning process.

I would like to commend your team for setting up a productive and positive process. We look forward to helping ODF complete an HCP that meets the multiple mandates for these irreplaceable State lands: provide a predictable source of timber revenue and other economic values for local communities; provide recreational opportunities and clean water for all Oregonians; and provide for the conservation of valuable fish and wildlife resources. We acknowledge that more technical, legal, and policy work remains. We have recently provided recommendations at the staff working level on improving the conservation strategy details and the clarity of the conservation commitments that have been drafted to date. We are committed to supporting the completion of this work after reviewing forthcoming details and advancing the HCP through the NEPA process towards permit issuance. I am confident we will complete the HCP permitting process in the expected timeframe. Please feel free to contact me directly if you have any questions or concerns regarding this letter or the HCP.

Sincerely,

PAUL HENSON Digitally signed by PAUL HENSON
Date: 2020.09.14 08:44:39 -07'00'

Paul Henson, Ph.D.
State Supervisor

Email Campaign Title: “Advance Durable Protections for State Forests”

Message:

Dear Members of the Oregon Board of Forestry,

I write to strongly support moving ahead with the State Forest Habitat Conservation Plan (SFHCP) for Western Oregon. The plan is a compromise that seeks a balance between different interests. I urge you to vote yes and continue with the planning process.

As you know, state forests are managed for a broad goal of “greatest permanent value” to the state.

In this era of climate change and endangered species, it is critical to support a balanced plan that conserves our natural resources for the future while also providing a mix of benefits for today.

The SFHCP is a compromise that balances timber harvest with fish and wildlife habitat, recreation, clean water, and climate mitigation.

The SFHCP provides significant conservation in important salmon and steelhead strongholds: the Wilson, Salmonberry, Nehalem, Miami, Trask, and Kilchis rivers. Lands adjacent to the 17-mile Nehalem State Scenic Waterway corridor will get increased protections under this plan. These are positive measures.

The HCP will also reduce the state’s liability to endangered species lawsuits, and the plan will also save the state money in the long run. As you know, ODF currently spends \$2.5 million annually just to survey and avoid endangered species habitat. This plan frees up these resources for the state, conservationists, and timber operators to focus on management, instead of on conflicts over endangered species.

We know there is more information and analysis coming in the NEPA process and afterward. But there has been a transparent two-year planning process to date. There is enough information to move forward. I ask you to continue this process by advancing this important plan.

Message Senders: 756 emails as of 11:59 p.m. on October 2, 2020

Email Campaign Titles: “Don't make the problem worse” and “Habitat Conservation Plan”

Message:

Dear Members Board of Forestry,

I understand that you're in the process of making a Habitat Conservation Plan for our state forests that could impact western Oregon communities for decades to come. This is an immensely important decision, and I'm writing today to ask you to make sure that this plan ensures reasonable and reliable timber harvest. These Forests were replanted by the citizens of Oregon following the devastating Tillamook fires that occurred back in the 1930's and 40's. These Forests were to be managed to provide revenues back to the counties and to provide jobs for the local sawmills and communities. This needs to be strongly considered as you develop the HCP.

The Oregon Department of Forestry has already reduced harvest levels to the point where there is not enough revenue to manage and protect our state forests. What's more, the Oregon Department of Forestry faces severe cash problems and the current plan would make it more reliant on our public tax dollars to stay afloat. Why would you consider a plan that dramatically decreases harvest and makes these problems worse?

Please protect our rural communities that rely on harvests from state forests for critical forestry and mill jobs.

Don't make a plan that decreases active management of our forests, putting jobs at risk and increasing the risk of catastrophic wildfires that put the health of firefighters and communities in peril.

Now is not the time to reduce harvest, cut jobs, and decrease revenue from state forests.

Message Senders: 269 emails as of 11:59 p.m. on October 2, 2020

Email Campaign Titles: “Don’t put our state lands off-limits,” “HCP Shouldn’t put our jobs and local services at risk,” and “Protects family-wage jobs”

Messages:

Dear Members Board of Forestry,

This is too much set aside. These are working forests, not nature reserves. Please ensure adequate harvest levels for local communities. It would be irresponsible to allow these lands to become financially nonviable by reducing harvests further.

Our state needs a Habitat Conservation Plan that protects family-wage jobs, keeps providing fiber for local mills, and invests in healthy forest management that reduces the risk of catastrophic wildfire. We do not need a plan that puts 10s of thousands of acres off-limits to harvest and forfeits millions of dollars in timber revenues that our communities need. Especially now.

Currently almost all of US Forest Service and Bureau of Land Management timberlands are off-limits for harvest, creating conditions that have driven environmentally devastating, uncontrolled wildfires. Don't put our state lands off-limits, too.

Instead, endorse a plan that includes effective reforestation tools, controlled burns, and smart, science-based forestry.

Do the right thing. Please make sure you keep in mind that the long-term impacts of this plan. The future our communities rely on making sure a Habitat Conservation Plan on our state forests protects critical jobs and a sustainable fiber supply. We need our state to do everything it can to protect jobs and provide revenue for the economy.

Please make sure that you endorse a plan includes things like effective reforestation tools, controlled burns, and smart, science-based forestry.

Message Senders: 338 emails as of 11:59 p.m. on October 2, 2020

Email Campaign Titles: “Please vote yes on the State Forest Habitat Conservation Plan” and “HCP Board Decision – In Support of HCP”

Messages:

I’m writing to you today in support of the State Forest Habitat Conservation Plan. I appreciate that this balanced approach values our state forests for habitat, recreation, and clean drinking water, rather than prioritizing logging above all else. I urge you to vote yes and continue with the planning process.

As you know, our state forests are incredibly valuable. They provide us with clean drinking water in rivers like the Wilson and Nehalem, which are also important homes for salmon and steelhead. They provide much-needed habitat for endangered spotted owls, and marbled murrelets. They’re beautiful and have enormous value for recreation. And, perhaps most importantly, temperate rainforests like those in our state forests are some of the best in the world at sequestering carbon and fighting climate change.

Please continue this process by voting yes on the State Forest Habitat Conservation Plan, so we can protect our state forests for future generations!

I write today to encourage you to continue pursuing a Habitat Conservation Plan for Western Oregon's state forests. In its current form, the draft Habitat Conservation Plan covers about 640,000 acres of Oregon forests and includes conservation strategies for listed species like at-risk Oregon Coast Coho Salmon. Forestry practices and inadequate stream protections on state forest lands were a primary factor in the federal government's decision to list Oregon Coast Coho Salmon as threatened with extinction. The ongoing clearcutting of steep, landslide-prone slopes and lack of sufficient stream buffers continues to impede the recovery of abundant, wild Coho Salmon throughout the streams of Oregon's northern coast range. It's time to forge a new future for our state forest lands—a future that enables our fish and wildlife to flourish and provides value to all Oregonians!

Please advance the Western Oregon Forests Habitat Conservation Plan (HCP) and follow the Oregon Department of Forestry (ODF) staff recommendation to “finalize the administrative draft of the HCP and move it into the NEPA process. I support durable habitat protections for imperiled species such as salmon, steelhead, Marbled murrelets and Spotted Owls by adopting the HCP. This is the best way to achieve multiple forest use values including but not necessarily limited to species conservation, clean water, forest recreation, and a sustainable predictable timber harvest. I support the ODF continued efforts toward bringing this HCP to a conclusion.

Message Senders: 771 emails as of 11:59 p.m.. on October 2, 2020

Email Campaign Title: “Worried about our state’s economy”

Message:

That's why I'm writing to ask that you protect Oregon's forest industry and 60,000 family-wage jobs Oregonians need now more than ever.

Why would the Board of Forestry even consider a state Habitat Conservation Plan that does not reflect any concern or understanding of rural county's financial condition or needs?

Please remember the mill workers who count on fiber from state forests. Please remember that rural communities in western Oregon rely upon the revenues from timber harvests to fund schools, libraries and other critical services. Please do the right thing.

Let's manage our forests with our children and grandchildren in mind - making sure our forests and the communities nearby will be healthy and thriving decades from now.

Message Senders: 238 emails as of 11:59 p.m.. on October 2, 2020

Submitted: Wed 09/02/2020 4:22 PM

Dear Members Board of Forestry,

The expansion of the HCP on State Lands is a very bad idea and needs to be rejected. Our Oregon Forests are now very well managed for wildlife, fisheries, wood products, and species diversity. This new plan would lock up more acres which will destroy more family wage jobs, the trickle down economy into the local rural communities, and greatly reduce tax revenues that benefit Oregon citizens.

This change is not a balanced solution and is not necessary. Please reject this job killing and timber revenue killing HCP.

Sincerely,

Bruce Alber
10033 N Willamette Blvd
Portland, OR 97203
bpalber@gmail.com

Submitted: Tue 09/29/2020 11:30 AM

I strongly support ODF's proposed Habitat Conservation Plan for Oregon's Coast Range. Not only is it important for our drinking water, but I think ultimately the recreation opportunities will offset the loss of revenue from logging. I would like to point out that we and some of our neighbors depend on surface water for all our water needs. Other neighbors depend on shallow wells. The conservation plan should be expanded to include protection of our water sources. I also strongly support the habitat conservation aspects of your proposed plan.

Thanks,

Joe Allbritton

16955 TOMLINSON RD, Nehalem, Or, 97131

joeallbrit@aol.com

Submitted: Monday, September 07, 2020 2:43 PM

To Members of the Oregon Board of Forestry:

The Oregon Department of Forestry should be planning for our children's future by doing an excellent job of combating climate change by protecting our forests. This does not mean business-as-usual with unregulated industrial forestry that is currently in vogue. ODF needs to demonstrate effective leadership in protecting critical forest habitat and clean water as well as promoting healthy forests. Plantation forests are not healthy forests. Nor is clear cutting. Oregon needs diverse forests that can withstand destructive wild fires, with mixed species of trees that foster both old growth and new growth in integrated forests and watersheds. It is time to implement 21st century forestry practices that take into account the devastating effects of global warming. Stop adhering to old and outdated forestry plans and practices that involve the timber companies and Wall street investors. I urge you to implement best in class practices with Oregon's forests by regulating and managing our state assets in a wise and thoughtful manner.

Lynn Anderson
lynna95@att.net
630.200.0651

Submitted: Thu 10/01/2020 10:42 AM

One of the reasons we moved to Oregon almost 10 years ago is because of its wonderful wildlife and forests. Now we strongly support the Western Oregon Forests Habitat Conservation Plan. Please “finalize the administrative draft of the HCP and move into the NEPA process.” Thank you for working on this plan! Your work and this plan is very important to so many Oregonians!

Thank you!

Caroline Arnold

carolinearnold@gmail.com

Submitted: Thu 09/17/2020 9:11 AM

I am writing to support HCP because of the following issues: drinking water protections, reduced pesticide usage, forest sustainability, endangered species, global warming and carbon storage, forest safety, and public recreational accesses. As a coastal resident I know we can do better than to relinquish our natural resources and quality of life to profiteering by outside and private interests. We have to find a better way to manage the forests for all concerned especially in the light of more drought and incendiary tree farm potential. If jobs seem to be an overriding issue, then put people to work thinning trees and clearing forest floors. Thank you.

Suzette Bell
1555 NW Sarkisian Drive, Seal Rock, Oregon 97376
suzen@rocketmaicom

Submitted: Tue 09/29/2020 11:11 AM

I support ODF's proposed Habitat Conservation Plan, and I encourage you to include community drinking water sources in the conservation areas. I have no problem with responsibly managed logging activities within designated areas, but we need to preserve certain areas in a natural condition.

Craig Berry
101 South 4th Avenue
eyesofthesun@outlook.com

Submitted: Mon 09/28/2020 11:34 AM

I am writing to let you know that I support the Habitat Conservation Plan. I believe planning for the long-term is in our best interest, and to that end our forests must be managed for conservation purposes and for the benefit of endangered species. Additionally, please consider assigning Habitat Conservation Areas to our endangered drinking water sources. Thank you for the work you do.

Sincerely,
Sheila Berry
101 S. 4th Ave., Rockaway Beach, OR 97136
101sunset@pm.me

Submitted: Fri 10/02/2020 3:55 PM

Dear ODF Board of Forestry,

First of all, thank you for the outstanding job on dealing with all our forest fires. I am so grateful! Here is how current logging practices have impacted me personally: I live in Twin Rocks, just south of Rockaway. There are large clear cuts on the hills above my house. Aerial spraying of this area in the past with out notification has made me ill. Expenses in dealing with upgrades to my air filters in my house this summer alone: around \$1200. (Before the fires came.) Also, the deer traffic has increased dramatically in the last 18 months. The damage to my yard was so extensive I could not plant vegetables or fruit, and my deceased father's flowers were ravaged two summers in a row. Additionally, I could not even walk around my yard without keeping my eyes peeled for deer droppings. I broke down and bought a pooper scoop. I own no pets. I am the 3rd neighbor this year to install a fence. Cost of fence and damage to yard: approaching \$1200, and more work to be done. There is also a massive clearcut surrounding Jetty Creek, which is where my drinking water comes from. The city of Rockaway tap water is some of the most expensive in the state: \$93.39 flat rate, every 60 days. This high rate is due to expensive upgrades to the water plant due to pollution of our water from Jetty Creek, and repeated EPA fines for water testing results above legal limits. I love our forests. I am a 3rd generation Pacific Northwest person. My father and I hiked numerous mountains and forests in western Washington and Oregon. He instilled a deep respect for our gorgeous woods and mountains. I wince every time I drive North on 101 and see the enlarging clearcuts just between Tillamook/Cape Meares, to the south, and heading north, to Jetty Creek, Wheeler, and the south side of Neahkahnie Mountain. It is heartbreaking. I even have had tourists ask me what these clearcuts were about. They were puzzled and could not understand why such a beautiful place was being managed and logged this way. Where they came from, this wasn't happening. I just forlornly told them it was because of Oregon State laws. This is why I am writing to tell you how grateful I am to hear about the Habitat Conservation Plan. This is a wonderful plan, and a great place to begin. I am urging you to consider including all areas that are drinking water watershed areas as well, for economic impact to us coastal residents alone. Tillamook County has been hard hit due to decreased revenue from the reduction of taxes collected from the logging industry timber sales. We citizens are bearing the brunt of this economically in reduced services, as well as the impacts I stated above. Thank you again for developing the Habitat Conservation Plan. I am so grateful for your efforts to manage such a huge forest area and develop this plan in the midst of the devastating loss we have experienced due to fires this season. My deceased father would be so pleased about the Habitat Conservation Plan. He worked for both Puget Sound Air Pollution Control and the DEQ after his time at Boeing. He had strong values about protecting our environment and was a life long conservative Republican.

Sincerely Yours,

Theresa Anne Bosserman

8035 S. Hollyhock St., Rockaway Beach, OR 97136

goldentheresann@gmail.com

Submitted: Wed 09/30/2020 10:07 PM

Dear members of the Board of Forestry,

I'm writing to urge you to advance the Western Oregon Forests Habitat Conservation Plan. As an Oregonian, it is important to me that we protect forests that house imperiled species, clean our water, and provide recreation opportunities. For these reasons, I support the staff recommendation to “finalize the administrative draft of the HCP and move into the NEPA process.” And I think a Habitat Conservation Plan is the best way to protect the land and wildlife, and to achieve sustainable predictable harvest. Thank you for your work on this plan. Please allow long-term protections for our forests by advancing the Habitat Conservation Plan.

Sincerely,
Antares Boyle
5828 NE Everett St.
Portland, OR 97213
<antaresboyle@gmail.com>

Submitted: Thu 10/01/2020 8:42 AM

Board of Forestry:

I am in favor of the Habitat Conservation Plan (HCP) with the following concerns.

1) The Plan allows for too much timber harvest outside of the HCP. Timber harvest on State forests is already damaging our landscape by the practice of regeneration harvest, which requires subsequent spraying with dangerous pesticides. I suggest that the practice of regeneration harvest be replaced with thinning of the many overgrown plantations that exist. This would be similar to the rules followed by the federal Forest Service in Oregon, where thinning of plantations provides needed wood.

2) The Plan allows for cutting of trees over 80 years old. I object to harvest of trees over 80 years of age. Older trees capture more carbon and there is no need to harvest these trees, as the ideal condition on the north coastal area generates large trees that are under 80 years of age.

Mike Brinkley
Eugene OR
mbrinkle@comcast.net

Submitted: Tue 09/29/2020 10:45 AM

Considering 1) forest recreation which continues to increase; 2) clean drinking water for coastal communities; 3) endangered species; 4) climate change which would be mitigated by the carbon sinks of forest, it is imperative that the State of Oregon choose to protect large amounts of its forest land into perpetuity.

Lucile Brook

12810 J St. Nehalem OR 97131

babbles@nehalem.tel.net

Submitted: Tue 09/29/2020 12:48 PM

Dear Board of Forestry,

I'm supporting the HCP for these reasons: The Williams valley, where I live is sustained by our watershed and I understand how other communities are affected by timber management. We need to protect those areas that are most vulnerable to global warming and to endangered species affected by timber management. ODF also needs to consider the value of forests in mitigating climate change. Oregon forests are the solution to decreasing greenhouse gases and global warming. ODF has an obligation to address the fires we have had in Oregon and the HCP will help to address the concerns by carbon sequestration.

Thank you

Cheryl Bruner

PO Box 493, Williams Oregon 97544

cebruner@hotmail.com

Submitted: Thu 09/24/2020 12:58 PM

The following applies to both public and private forests.

----- Forwarded message -----

As the Fall rains bring an end to most of the fires that have burned a record amount of land, destroyed small towns and many homes the same old question comes to surface: Why do we have these catastrophic fires year after year? Frustration and anger is what follows after the smoke begins to settle, especially from those that have lost everything. There is the sad story of a ranching family that had a grazing allotment on the Plumas National Forest in California and are out looking for their cattle. They have found many dead, some needing to be euthanized and a few roaming along forest roads in search of water and feed. They, along with many others are angry with mismanagement of the National Forests over the last decades. They don't blame the local Forest Service employees, but those in Washington DC that have no understanding of how the forest should be managed at the local level. Fires have always been part of the ecosystem. Over the last 100+ years we have suppressed fires letting the forest floor build up with an understory of brush and small trees. Years of uneven-aged management on both federal forests and private timber lands creating second growth plantations susceptible to fire under extreme fire conditions. Then there is climate change as the summers become longer and warmer with less rainfall and snowpack in the winters. Over the last 10 years more and more conifers at the lower elevation are dying from drought and insect infestations increasing the fire risk. What is the answer--more controlled fires, more thinning of forests, more defensible space around communities and homes in the forests? Some of this is happening, but not to the scale and intensive it should be. No doubt funding is insufficient, but think of all the money going to suppression. How is the OSU School of Forestry addressing this in their curriculum? When will there be more action?

Mike Burke
Oakland, Oregon
farmhand.mike@gmail.com

Submitted: Mon 09/07/2020 10:51 PM

Dear Members Board of Forestry,

Our state needs a Habitat Conservation Plan that ensures long term protection of natural resources with some harvesting. Riparian zones need protection with wide buffers, and include headwaters (that feed cool, clean water into streams and rivers).. ,Most of Oregon forests have been clearcut and need time to grow back. Do not push for increased timber harvest.

Sincerely,

Bruce Bury
1410 NW 12th St
Corvallis, OR 97330
burybr@peak.org

TESTIMONY BEFORE BOARD OF FORESTRY
ON HABITAT CONSERVATION PLAN—OCTOBER 6, 2020

I'm Ron Byers. I live on the Trask River outside Tillamook. I've spoken to you several times about the wisdom of and need for a Habitat Conservation Plan (HCP). It feels like progress to be now urging you to adopt your staff's report and take the next step with an environmental impact study.

There are a lot of reasons to adopt a HCP. It's an insurance policy that provides security and certainty for all who depend on timber revenue by preempting endangered species litigation. We all know that more listings are inevitable; a HCP is what allows us to move forward in uncertain times. This is a lesson from the Elliot State Forest.

This financial security should be reason enough to adopt a HCP, but there are many other compelling reasons. For example, it helps us address that critical question of sustainability, and it generates more balance in our management of state forestlands.

It protects endangered species. If a HCP had been in place, the State would not be spending time and money on Coho salmon litigation, defending forest practices that are pushing species toward extinction. Another lesson I hope.

A HCP will significantly reduce the amount of pesticides in our state forests. There are a number of coastal communities I know of that are united in their concerns about the mixes of chemicals being applied near our homes, water sources and food chains. No one even knows the health implications of these poisonous mixtures because they have never been independently studied when combined.

With a HCP, we'd get an opportunity to measure the role forestlands play in carbon storage and how forests address climate change. It seems so right that part of the public's forests address environmental concerns which effect all of our abilities to live here going forward.

I'll mention one other compelling benefit of a HCP and that is the educational potential of using part of our state forestlands as a classroom for

young people to learn firsthand about our natural world—an outdoor school that will get our kids more involved in our forests.

Most of the reasons being advanced to drop this pursuit come from people with timber harvesting backgrounds and interests. It's important that you know there are a bunch of us that don't gain financially from our State forests that want a HCP. And we think our opinion should matter more because we are the communities that live the results—and I mean all the results--of your forest practices decisions.

To close, we need the financial security of a HCP, and it's time for a grander view of our state forests. Please adopt your staff's report and move on to the environmental study. Thank you.

Ron Byers

Submitted: Sun 09/27/2020 1:34 PM

The Oregon coast (environment and people) desperately needs to start approving plans that move toward conservation. This is only a start. The logging companies have abused our state for too long... disrespecting the land, using financial power to control the policies that citizens should control, infiltrating our government to push lax destructive rules that only help themselves, and then carelessly profiting from outdated slash, burn, and spray methods of the thing Oregonians love the most about our home. Logging executives are non-locals who lick their lips as they think of our land as an endless well of money from which they can extract value from, and it's only really benefitting them, as they've used legal influence over the years to renege from paying taxes to local communities. Only bad things have come from excessive logging. Only good things can come from conservation. Let's make sure our forests don't become deserts.

Mark Calvarese
16850 Lucky Ln
markevan91@gmail.com

Submitted: Tue 09/29/2020 5:40 PM

I support the Habitat Conservation Areas. We need to maintain healthier forests in Oregon for our future on this planet and the HCP a great way to do so. I live in Seaside, OR with my wife and two small children and see immense value in a healthier forest that provides our state with clean drinking water, a robust economy that better takes advantages of all that our rainforests have to offer, and also the possibility to help protect our planet from global warming. Thank you for listening and please help protect our future.

Alex Carney
Seaside, OR, 97138
carneyalex@gmail.com

Submitted: Thu 10/01/2020 4:24 PM

Greetings from a senior citizen at Rose Villa in Clackamas County.

I applaud your actions that preserve our precious forrest that sequester carbon and enhance our quality of life in Oregon. Please hold a tight rein on those who consider it theirs to plunder!

Thank you.

James Carthel

713 - 248-0617

james.t.carthel@gmail.com

Submitted: Wed 09/02/2020 4:30 PM

Dear Members Board of Forestry,

The clean cold water out salmon, steel head and trout need comes from these forests as much as logs. Timber harvest is over done and poorly regulated with a total blind spot as to the damage done to these fish runs and is a very damaging impact to the local economy too. Just ask the fishing guides. Please write rules tah recognize the importance of the fish runs.

Sincerely,

Richard Chasm
PO Box 51
Dillard, OR 97432
richard.chasm@earthlink.net

Submitted: Thu 09/24/2020 5:21 PM

Re: Habitat Conservation Plan and EIS Please move forward with this process. It is unconscionable to not have a habitat conservation plan for our state public forest denizens. Not only are there many low profile species who need their homes protected but our state forests also support several rare and threatened species such as coho salmon and steelhead which are of economic importance to our people. We also have threatened old growth species including the spotted owl and the marbled murrelet. The fact is there will never be habitat conservation or old growth ever again on the large acres of private industrial timber lands that surround and intermingle with our public lands. If we are to keep these valuable native species habitat for them must be protected and restored on the public lands. If not there, then where?

Theodore Chu
41400 Anderson Rd, Nehalem, Oregon 97131
yuiqwel@gmail.com

Submitted: Fri 10/02/2020 2:27 PM

Board of Forestry,

I'm writing to ask for your support for the Habitat Conservation Plan for Oregon forests. As you know, this is a compromise solution that will ensure that half of state forest lands west of the Cascades will be managed for conservation purposes and for endangered species. Whether you view this as the glass being half full or half empty, it is still a good compromise between the various interest groups, and will allow everyone to move forward based on settled, management plans rather than uncertainty and ongoing legal battles. The conservation areas of course should include key drinking water sources for communities in addition to areas of importance for endangered species habitat and other conservation goals. Please help our state move forward with both smart conservation policy and smart, sustainable forest products industries.

Michael Coe
1732 SE 71st Ave., Portland OR 97215
mcoe@cedarlakeresearch.com

Submitted: Thu 10/01/2020 4:03 PM

Dear Board of Forestry,

I am writing to you in support of the State Forest Habitat Conservation Plan. Oregon must preserve its forests to provide many things: native habitat for our wild life, clean water and recreational areas for its citizens. Logging should not come before these things.

Evelyn Cole

eveycole86@gmail.com

Submitted: Friday, October 02, 2020 7:59 AM

Oregon State Board of Forestry

I support the HCP currently under consideration by ODF. It is essential that all public lands be managed for multiple values so our forests continue to provide essential ecological services. As scientific understanding increases, maintaining our forests as functioning ecosystems is their “greatest permanent value” to our citizens, Earth and future generations. Best available science now points out that in addition to storing large amounts of carbon, which is currently being released through logging, especially clearcuts, our intact forests, especially on the Westside of the Cascades, actually can draw down significant CO2 from our atmosphere. This is necessary if we are to slow and ultimately stop our current path of continued global warming and the ever more obvious and destructive climate change that results. It is ecological suicide to think we can continue business as usual in our forests. The HCP is the current best means to promote the long term sustainability of the essential multiple ecological services that our healthy forests provide.

Thank you for your consideration.

Gail and Robert Cordell
17370 S. Potter Rd Oregon City, OR
cordellbank@comcast.net
503 888 5462

Submitted: Tue 09/29/2020 6:18 PM

Dear members of the Board,

I highly support your proposed Habit Conservation Plan. I am encouraged and immensely grateful for this plan, as a significant step forward. It feels to me and many others I know that the time has come where the lack of protection of our important eco systems has reached a critical moment. Our drinking waters are getting poisoned by logging chemicals, more and more critical forest eco systems are being destroyed, without understanding the grave consequences of continuing to do this. Clear cut logging is the greatest force of destruction in Oregon adding to climate change, not to mention that humans depend on the Earth world to be well treated, repaired and respected to even survive into the next century. The plan would be a great help to protect vulnerable eco systems, prevent further extinction of endangered species, and offer the possibility to protect our drinking water. Some of the features of this plan I am in great support of: The HCP would create forest set asides for nearly HALF of the state forest lands managed by ODF west of the Cascades. The Habitat Conservation Areas would be managed for conservation purposes and for endangered species. This means no logging or spraying in 640,000 acres. The HCP is a compromise, and creates certainty and stability for all involved parties. Funding for schools and rural counties would be stabilized because there would be no endangered species lawsuits that shut down forest lands. I urge you to consider assigning Habitat Conservation Areas to our drinking water sources. If ODF is willing to set aside hundreds of thousands of acres, then those areas should include our communities' endangered drinking water as well. I live in the Nehalem Bay Area and there are so many residents here who feel threatened by the clear cut logging due to erosion issues and our drinking water being poisoned by the cocktail of chemicals that are proven to be hazardous to our health. I am eagerly waiting for the Oregon Board of Forestry to take a leading role in protection the natural world and the people, in ways that benefit all. Thank you very much for your consideration. I am very grateful you are working to restore greater balance and harmony to our forests. It will have positive rewards far greater even than we can imagine.

Sincerely,

Sjoukje Dekker
Nehalem, OR, 97131
shaukya@yahoo.com

Submitted: Fri 10/02/2020 10:08 AM

Dear Board members, this isn't a stock response letter. I have just regained employment that depends on the timber industry. Now, I understand that you're in the process of making a Habitat Conservation Plan for our state forests that could have an impact on western Oregon communities for decades to come. This is an immensely important decision, and I'm writing today to ask you to make sure that this plan ensures reasonable and reliable timber harvest. To do so you may think is an enormous task and it is. But maybe a solution that benefits us all is needed. I think you have that solution with facts that have come about with these latest fires. One is to allow forest cleaning deeper into portions that need it most. Removing trees that are sick or already killed by past fires. Creating logging roads as they go and allowing future fires to be more accessible and easily contained. As a resource of this country it is critical that it continues to produce and therefore feed those that otherwise would have no job and create entire communities of once hard working Americans into homeless dependents or even worse, overcrowd our prison systems.

The Oregon Department of Forestry has already reduced harvest levels to the point where there is not enough revenue to manage and protect our state forests. What's more, the Oregon Department of Forestry faces severe cash problems and the current plan would make it more reliant on our public tax dollars to stay afloat. Why would you consider a plan that dramatically decreases harvest and makes these problems worse?

Please protect our rural communities that rely on harvests from state forests for critical forestry and mill jobs.

Don't make a plan that decreases active management of our forests, putting jobs at risk and increasing the risk of catastrophic wildfires that put the health of firefighters and communities in peril.

Now is not the time to reduce harvest, cut jobs, and decrease revenue from state forests.

I appreciate your help,
Jody Demeritt
PO Box 2102
Winston, OR 97496
Jody.Demeritt.372039547@p2a.co

Dear Tom,

I urge you to continue with the Habitat Conservation Plan of the Tillamook and Clatsop and protect the habitat of the marbled murrelet.

My family enjoys walking in these wonderful woods but we are distressed by the amount of clearcuts.

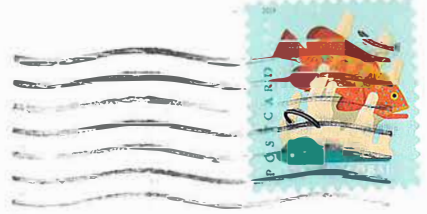
Protecting our coastal rainforests saves incredible resources: water quality, walking trails, bicycling rail-to-trail and wildlife.

The marbled murrelet inhabits these forests: please protect them because they are our inheritance for future generations.

Sincerely,
Florence Dejeux

Portland
97206

Florence R. Dezeix
5527 SE Tolman St
Portland, OR 97206



Chairman Tom Imeson
Board of Forestry
Board Support Office
2600 State St
Salem, OR 97310



Submitted: Wed 09/30/2020 4:05 PM

I am writing in opposition to the State Forest Habitat Conservation Plan that will lockdown Tillamook and Clatsop State Forests.

We recently watched as our forests burned because of poor forest and fuels management. This is a direct result of policies that extreme environmental groups like OLCV support and promote. What are forests need is real management that includes logging and thinning.

I am a lifelong Oregon resident, born in Eugene. I have spent the majority of my life in the outdoors as a sportsman, outdoorsman, and firefighter. It saddens me to see what has happened to our forests because of bad policy. Enough is enough. It's time we really start managing our forests instead of locking them down only to watch them burn later.

So, I am urging you to vote NO.

Thank you,
Brian Dunn
dunnbrian11@gmail.com

Submitted: Tue 09/29/2020 9:23 PM

I write in support of Oregon's Habitat Conservation Plan. Climate change has brought wildfires to much of Oregon and even to the temperate rainforest of the coast. Three hundred houses were destroyed in the recent Echo Mountain fire. Families were displaced and with the acute housing shortage in Lincoln County, many of these families will be leaving our community for good. We need to make our communities less susceptible to catastrophic wildfire. Planting monoculture stands of Douglas fir, harvesting those trees in forty years, spraying herbicides on that land and starting the process all over again might make for a profitable harvest but are such forests resilient? Can these tree plantations be called forests at all? The unlogged portion of the Siuslaw National Forest that runs adjacent to where the Echo Mountain Fire burned was untouched by fire. This might have been partially due to luck but scientists have shown us that mature coastal forests like the Siuslaw act as sponges that are incredibly difficult to burn. We need more of these mature coastal forests. Over time, the HCP will add mature and diverse fire resilient forests to the state's inventory. Logging is central to Oregon's economy and culture and according to the HCP, will continue to be so, but the state's forests should not be managed for the sole purpose of providing profit to the timber industry. Oregon's coastal forests have the capacity to store massive amounts of carbon, deter catastrophic wildfire, and provide habitat for endangered salmon and spotted owls. These forests also provide clean drinking water for our coastal communities. I'm fortunate enough to live in Lincoln City where our water comes from Schooner Creek which runs primarily through the Late Successional Reserve of the Siuslaw National Forest. Our community doesn't have to worry about steep hillsides being logged triggering winter landslides that would degrade the city's water supply. This wasn't the case at Jetty Creek. That watershed there is privately owned and was logged extensively. Rockaway Beach's water supply was degraded to such a degree that the city had to pay for expensive upgrades to fix a water system that had the forest been managed better, wouldn't have had to have been upgraded at all. Admittedly, the Jetty Creek watershed is owned by private interests and not the state, however I worry that without regulatory barriers that the cash strapped Oregon Department of Forestry will be persuaded by the timber industry to allow clear cutting of similar coastal watersheds. The HCP allows scientists a voice in the forest and not just the timber industry and the Oregon Department of Forestry, an agency whose very existence is dependent on the timber industry. With scientists being given a say in what happens in our state forests and lands being placed into or out of production by the HCP, the timber companies will have clarity as to what they can and cannot log. Companies like consistency and deny litigation. For these reasons, over the long term, timber companies and the communities that their dollars support will benefit from the HCP. I appreciate the state's attempt to put conservation of our state forests on equal footing with the needs of the timber industry. The HCP is an attempt to ensure that the finite timber resources of our state will not be abused by those seeking short term profit and that future generations will have healthy state forests to log and recreate in. Please approve the HCP.

Thank you,
Michael Edwards
1606 NW 26th Street Lincoln City, OR 97367
medwardsnewportbeach@gmail.com

Submitted: Wed 09/30/2020 2:53 PM

Dear Members of the Oregon Board of Forestry,

I am a 7th generation Oregonian writing in support of a strong Habitat Conservation Plan for Western Oregon's state forests. Since settling this land, native fish and habitat have been systematically destroyed in the pursuit of extraction based resources. It saddens me to know in that in less than 2 centuries, we have driven whole species and ecosystems to the brink of extinction. I have been personal witness to the destruction of logging adjacent to our coastal streams in the pursuit of our dwindling runs of wild winter steelhead. These rivers have no dams, and yet the fish still decline as silt runs off steep logged hillsides into the spawning beds and the rivers lose critical shade in a time of global warming. It is past time that we create policy and protections to ensure a sustainable future for the wild places that remain, and restoration where possible for those that are not damaged beyond recovery. We all deserve a future for our children that represents the best of what we love in this state we call home. And yes, this can be balanced with sustainable harvest of our natural resources, but protection of our fish and the fragile ecosystems they share with us needs to be the first priority, not industry.

Thank you for your time,

Brian Emerick
Principal Emerick Architects
321 SW Fourth AVE #200
Portland OR 97204
503 235 9400x201
brian@emerick-architects.com

Submitted: Tue 09/29/2020 1:51 PM

To: ODF BOARD OF FORESTRY

As a resident of the Nehalem River Valley for the last 30 years, I strongly support the proposed Habitat Conservation Plan. As a compromise, it addresses both the need for State Forests to provide income and the growing concern about the health and safety of coastal watersheds. The dangers of a management policy based on clear cutting has become increasingly clear as our rivers and streams fill with silt, and toxic chemicals are used near our homes and water sources. Recent evidence indicates that wild fires race through clear cut areas with even more intensity than those buffered with trees. There is now also abundant evidence that forests help in controlling climate change by cooling the earth, by holding the waters, by purifying the air. These are not “romantic notions” but consequences based on scientific evidence and first hand experience. The people of Oregon depend on ODF to manage their forests in a way that provides not only income but a healthy environment for the people who live here. They also have a responsibility to the animals, birds, and fish populations who depend on forests as their habitat. This is a creative compromise. My hope is that ODF will accept the challenge and move forward in keeping Oregon green—and livable.

Gwendolyn Endicott
42130 Anderson rd. Nehalem, Oregon 97131
gwendolyn@nehalemtnet.net

Submitted: Fri 09/25/2020 10:02 AM

Members of the Forestry Board,

As North Coast landowners and residents, we are writing to support a Forestry Board vote to continue with ODF's HCP proposal and, specifically, inclusion of the ODF managed Norriston Heights/Hug Point parcel in this proposed plan.

Our neighborhood has been working with ODF for over a year to protect this parcel on the northern Oregon Coast in the Arch Cape area. We are not part of a water district and runoff from this property is our neighborhood's only source of drinking water. Besides being a protected species habitat, this forested area provides over 20 homes along the Oregon coast with water from state granted water rights that date back to the 1970's.

Your vote in favor of permitting the ODF staff to continue its work on this plan, with inclusion of the Hug Point parcel in this plan, would be appreciated by all in our neighborhood.

Thank you in advance for your consideration of our position on this important topic.

Emily Ericson and Richard Martens
32774 Picture Windows Lane
Arch Cape, OR 97102
ericson@comcast.net

Submitted: Fri 10/02/2020 10:19 AM

I am a member of the Mazamas Conservation Committee and I feel very strongly that on 10/6 you must support the Habitat Conservation Plan for the Tillamook and Clatsop forests. We need to protect salmon and steelhead, water supply, and recreational opportunities. Save our forests! Vote yes for the Habitat Conservation Plan!

Kate Evans
2398 Hillside Lane Lake Oswego OR 97034
kateevans97@gmail.com

Submitted: Fri 10/02/2020 11:26 AM

I am writing in support of the HCP setting aside forest land managed by ODF west of the Cascades. Please consider that no logging or spraying in this 640,000 acres will protect habitat for many species as well as drinking water sources for many communities if it is implemented in thoughtful manner. By approving this compromise, it will create stability in funding for schools and rural counties as well as bringing opposite points of view to the table so everyone wins something important.

Melissa Farlow
2000 Maxwell Mountain Rd Oceanside, OR 97134
melissafarlow@me.com

Submitted: Tue 09/29/2020 10:12 PM

I support the HCP and protecting 640,000 acres of Oregon's forested land by placing those into a conservation plan, giving special protections and considerations for the sensitive watershed areas which provide Oregonians with clean drinking water. This plan is a compromise and one that is fair to all parties involved. Please accept my comments for consideration.

Thank you,
Fauna Fauth
21690 E Beaver Creek Rd. Cloverdale, OR 97112
fj3cats@gmail.com

Submitted: Sat 09/05/2020 5:22 PM

To Oregon Board of Forestry,

Our state needs a Habitat Conservation Plan that protects family-wage jobs, keeps providing fiber for local mills, and invests in healthy forest management that reduces the risk of catastrophic wildfire.

We do not need a plan that puts 100s of thousands of acres off-limits to harvest and forfeits millions of dollars in timber revenues that our communities need. Especially now.

Currently almost all of US Forest Service and Bureau of Land Management timberlands are off-limits for harvest, creating conditions that have driven environmentally devastating, uncontrolled wildfires. Don't put our state lands off-limits, too.

Instead, endorse a plan that includes effective reforestation tools, controlled burns, and smart, science-based forestry.

Do the right thing. Please make sure you keep in mind that the long-term impacts of this plan. The future our communities rely on making sure a Habitat Conservation Plan on our state forests protects critical jobs and a sustainable fiber supply. We need our state to do everything it can to protect jobs and provide revenue for the economy.

Sincerely,
Brian Franklin
5419159102@vzwpix.com

Thomas Imeson: Chair
Oregon Board of Forestry
Department of Forestry
2600 State Street
Salem, Oregon

September 11 2020

Reference: Proposed Habitat Conservation Plan for State of Oregon managed lands

Dear Board members,

Thank you for the opportunity to comment on the proposed HCP. The process has been uncharacteristically nontransparent to the public and stakeholder up until now.

Freres Lumber Co. Inc is a 98 year old firm employing 475 people in the Santiam Canyon in Oregon. We are the most public timber dependent company in Oregon. We are a top 5 purchaser of ODF timber sales.

Our company opposes the HCP. The agency went through the HCP process for the Elliott State Forest and decided against pursuing the HCP. All the reasons forgoing the HCP in the past still exist today.

The Oregon Department of Forestry has proceeded through this secret process while ignoring the breach of contract verdict awarding the counties \$1.1 billion.

Given the inability of the ODF to manage its financial affairs and live up to its fiduciary obligations the counties, the proper remedy is not an HCP which further reduces management and continues the ODF breach of contract with the counties.

Freres Lumber Co. Inc. recommends the Department of Forestry through the Justice Department negotiate a return of title of lands ODF manages to the counties. This would significantly reduce the state's liability and discontinue enormous accruing daily interest.

The Department of Forestry is an effective fire fighting agency. It provides a valuable compliance function of the Oregon Forest Practices Act.

Freres Lumber Co. Inc. recommends that the ODF mission be narrowed to the functions just mentioned following the return of title to the county lands. This should allow greater budget control and reduce the size of the agency.

The present HCP proposal does not balance rural Oregonians needs. It does not protect the lands from fire by implementing a non management scheme. We can all look to the Federal land's lack of management and the nearly 10 million acres burned in Oregon in the past two decades. Well over 80% of the lands burned were on public lands. Private land management has proven to be the most effective conservation method.

An HCP would place a static land use designation on a dynamic ecosystem for decades to come. The premise behind an HCP is flawed. Please abandon the process as the Board of Forestry has in the past. The department has negotiated away far more land for habitat than private parties with HCPs. Please end the process.

Please consider these additional factors: Private ownership of Oregon forest lands has dramatically changed over the past 30 years. Real Estate Investment Trusts and Timber Investment Management Organizations with their out of state ownership now control millions of acres. They recently refused to pay to contest 4 ballot measures that environmental groups threatened to put before voters. A memorandum of understanding was signed by 13 companies and 13 green groups to negotiate away what is expected to be 25% of the productive capacity of private lands in Oregon providing conservation requirements on 4-5 million acres of forest land.

Fires which destroyed 1 million acres in Oregon are still burning showing what the lack of management for the past 27 years on Federal land has caused. Conservation on Federal land has failed to protect over 10 million acres which have burned in just 20 years. That amounts to 1/3 of all forest land in Oregon. Fires and climate change do not respect property boundaries so failure to manage fuel loads is the obvious culprit. The Board of Forestry should need no more proof to end the HCP process now.

Oregonians have suffered for 3 decades with 90% of Federal lands off limits to timber harvesting in a failed attempt to save the spotted owl. Now the ODF staff recommends locking up 1/2 of the lands they manage for 70 years and private property owners are seeing 1/4 of their property rights being negotiated away by out of state interests. The timber manufacturing capacity in rural Oregon will certainly be sharply reduced over time because of these fires and public policies. Rural Oregon has been destitute because of Federal policy for decades and now the consequences are death and destruction of hundreds of homes and businesses and thousands fleeing for their lives and the board is being asked to endorse more of this for the next 70 years?

I close by saying no one with a conscience or concern for fellow Oregonians can vote to proceed with the Habitat Conservation Plan. Please do the right thing and vote no on the HCP.

Sincerely,

A handwritten signature in blue ink that reads "Robert Freres, Jr." in a cursive style.

Robert Freres, Jr.
President Freres Lumber Co., Inc.

Submitted: Tue 09/29/2020 9:11 PM

As a small woodlot owner and a Clatsop County resident, I ask that you vote on October 6th to move the Clatsop & Tillamook State Forest Habitat Conservation Plan development to the next phase, the NEPA process. I understand that this is not a final vote, but an opportunity to explore it further and involve the public more. I have attended several of the meetings and know that we have much to learn. My young son goes to a rural public school. We live in an unincorporated rural community with county services. I know that timber money benefits us. I also know that it is uncertain in the current situation. The HCP is a compromise. It creates more certainty. Funding for schools and rural counties would be stabilized because lawsuits that shut down forest lands will no longer happen. If successful, the HCP will ensure that all of the benefits of the forest will be balanced – timber, wildlife, carbon mitigation, recreation, scenery and clean drinking water – and it will serve the state for years to come. Thank you in advance for being part of the solution.

Nadia Gardner

80285 Woodland Heights Road Arch Cape, OR 97102

NadiaEGardner@gmail.com

Submitted: Fri 10/02/2020 6:15 AM

I urge the Oregon Board of Forestry to move forward with the Habitat Conservation Plan. Finalizing the draft is an important step to help protect Oregon wildlife and the habitat that sustains them. Oregon's greatest resources need this attention now more than ever.

Sincerely,
Phillip Goetzinger
pmgoetz@outlook.com

Dear Dept. of Forestry,

I am writing to express my strong support for the Habitat Conservation Plan being considered. (HCP) Our forests are supposed to be managed for the greatest permanent value but at the moment this often means that timber harvesting is considered first before any other values. This plan is a compromise that should provide stable protection for conservation and endangered species while also provide stable timber harvesting areas. Specific advantages include significant protection for important salmon and steelhead strongholds, particularly the Wilson, Salmonberry, Nehalem, Miami, Trask, and Kilchis Rivers and protection for towns' rural water sources. The HCP frees up resources for the state, conservationists, and the timber companies by defining those areas which will be managed primarily for timber and those areas primarily managed for other uses, including drinking water source protection, endangered species, recreation, habitat protection and climate mitigation. The proposed plan protects 50% of one of Oregon's important forests for carbon absorption and climate change mitigation.

Our forests can provide countless value to us helping with climate change mitigation, as a place for folks to recreate, as home for endangered and non-endangered species, and as our drinking water sources. The current plan puts timber harvesting above all this and it has done and is doing long term damage. I don't think this plan is perfect but it is a compromise that has been carefully crafted by a multitude of experts to work for everyone. Please, please support this plan.

Sincerely,

Hope Stanton and David Graves
43005 North Fork Rd, Nehalem OR
hopecstanton@gmail.com

Submitted: Tue 09/29/2020 1:19 PM

Please support the Habitat Conservation Plan! We need to protect as much forest as possible for habitat, for recreation, and for its vital role in storing carbon to balance the environment. Thank you!

Glenna L Gray
36300 Pacific Palisades
glenna@nehalemtnet.net

Submitted: Wed 09/30/2020 9:33 PM

Dear Board of Forestry,

I am writing to ask that you move ahead with the State Forest Habitat Conservation Plan (SFHCP) for Western Oregon. As you know, state forests are managed for a broad goal of “greatest permanent value” to the state. In this era of climate change and habitat loss, the greatest permanent value of these forests are to conserve our natural resources for the future. The SFHCP is a compromise that balances timber harvest with fish and wildlife habitat, recreation, clean water, and climate mitigation. It will protect areas of forest from harvest for decades to come, allowing them to sequester and store atmospheric carbon undisturbed.

The HCP will also save the state money in the long run by reducing the state’s liability to endangered species lawsuits and reducing the \$2.5 million annually spent just to survey and avoid endangered species habitat. This plan frees up these resources for the state, conservationists, and timber operators to focus on management, instead of on conflicts over endangered species.

Kind regards,
Leslie Grush
350PDX Forest Defense
lesliegrush@gmail.com

Submitted: Fri 10/02/2020 4:01 PM

I SUPPORT ODF's Habitat Conservation Plan. I live in Tillamook County, where the state and private timber companies log entirely too much and far too close to our homes and water sources. The timber companies do NOT speak for us Oregonians in rural counties! We know that we are not getting our fair share of taxes from logging, that logging more will not fill our county budget shortfalls, and we can see clearly which governing agencies and elected officials are in the timber industry's pocket. We see the timber industry for what it is, and I want to support ODF to resist their insidious pressure. More of us are watching now than ever. Furthermore, Climate change is imminent and will not head industry desires for business as usual. The time has come to change the way we value our Pacific Temperate Rainforests! Lastly, I want there to be forests left for my children. Thank you to ODF staff for working on gaining greater protections for our State forests.

Jordan Gulaskey
14955 Old Mohler Rd
jgulaskey@gmail.com

Submitted: Friday, September 25, 2020 10:20:14 PM

Dear Members Board of Forestry,

I believe Active Forest Management will create jobs in all sectors while bringing back the resiliency to our forest, which so desperately needs tended to at this critical time. To do less than actively reduce the competitive vegetative fuel load will only increase brownout form competition for moisture and the end results are brownout and finally wildfires.

Why not create jobs and sustain a community while reducing carbon emissions when you are proactive in reducing huge conflagrations that cost millions more than you would be better spent on managing the forest/creating jobs and reduction of PM2.5 particulates as well as maximizing retention of CO2 by reducing inevitable wildfires if you do less than active forest management? Please read Forest Under Stress (FUS) for ways to practice active forest management.

Kindly, Rachel Lee Hall for Forest Under Stress (FUS)

<https://www.forestunderstress.com/>

Our state needs a Habitat Conservation Plan that protects family-wage jobs, keeps providing fiber for local mills, and invests in healthy forest management that reduces the risk of catastrophic wildfire. We do not need a plan that puts 10s of thousands of acres off-limits to harvest and forfeits millions of dollars in timber revenues that our communities need. Especially now. Currently almost all of US Forest Service and Bureau of Land Management timberlands are off-limits for harvest, creating conditions that have driven environmentally devastating, uncontrolled wildfires. Don't put our state lands off-limits, too.

Instead, endorse a plan that includes effective reforestation tools, controlled burns, and smart, science-based forestry. Do the right thing. Please make sure you keep in mind that the long-term impacts of this plan. The future our communities rely on making sure a Habitat Conservation Plan on our state forests protects critical jobs and a sustainable fiber supply. We need our state to do everything it can to protect jobs and provide revenue for the economy.

Sincerely,

Rachel Hall

4973 Old Upton Rd

Central Point, OR 97502

fanfourplus@gmail.com

Submitted: Thu 10/01/2020 2:48 PM

Dear Board Members,

I live in heavily forested Clatsop County. I am writing in support of the proposed State Forest Habitat Conservation Plan. The many competing needs of the timber and wood products industries, fisheries, wildlife habitat, forest diversity, water quality, recreation, and biggest of all, climate change, requires careful consideration and compromise. I believe this plan does that. Additionally, it provides long-term stability, good for all parties. I urge the Board to see the value in the SFHCP, and move it forward to the next phase.

Eric Halperin

PO Box 2864 Gearhart OR 97138

ehod1@yahoo.com

Submitted: Fri 10/02/2020 9:04 AM

Before moving to the Pacific Northwest in 2014, I was the Executive Director of the Coachella Valley Mountains Conservancy, a California state agency in the Coachella valley (Palm Springs, Palm Desert, etc.) In that capacity I was the lead author of the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP), which covered approximately 1.2 million acres. Under California law, it was also a Natural Community Conservation Plan. Information about this very successful plan is available at www.cvmshcp.org. Based on the success of that plan, I urge the Board to continue preparation of the HCP for Western Oregon Forests. I also urge the Board to consider future opportunities to expand the HCP into a multi-jurisdictional plan. The CVMSHCP Permittees included nine cities, the County of Riverside, Caltrans, State Parks, and several local special districts providing flood control, water, and electric utility services in the area. The inclusion of so many jurisdictions certainly increased the complexity of the Plan, but also made it far more robust and beneficial both for the environment and the local economy. Further, while federal agencies may not be Permittees under an HCP, BLM, USFS, and NPS were all cooperators in the planning and implementation process and addressed their contributions to the process and implementation plan in their respective management plans.

Sincerely,

Bill Havert

billhavert@verizon.net

Submitted: Tue 09/15/2020 6:17 PM

Dear Oregon Board of Forestry members,

I am writing in support of continued work towards an HCP for state forestland. The risk of not pursuing this work is simply too great. Frequent litigation, proposed ballot initiatives, and protests from both sides have marred forest management for the past decade. In addition, Oregon lags Washington and Oregon in terms of managing for a multitude of values, including timber jobs and revenue, water quality and quantity, recreation, habitat, and many more. It is time to properly think about these resources and plan for a future that may not maximize near-term revenue, but will optimize for a sustainable system that exists for our grandchildren. As a professional forester and neighbor to the Tillamook / Clatsop State Forest, I see the importance of ongoing management and stewardship. I believe that this can be done with an HCP, and that an HCP is possibly our best chance at balancing competing voices going forward. Please continue the process and work to bridge the many communities that rely on State forestland.

Sincerely, -Ben Hayes

Benjamin Hayes
30151 NW Timber Rd. Timber, OR 97144
ben@springboardforestry.com

Submitted: Mon 09/21/2020 4:48 PM

To: ODF Staff and Board of Forestry Members
From: Peter Hayes
Sept. 21, 2020

I write to communicate my strongest encouragement to maintain a strong commitment to successfully developing and effectively implementing a Habitat Conservation Plan for westside forests.

As an active forest owner and steward and as a former member of the Board of Forestry, I am familiar with the history of and potential value of HCPs throughout the Pacific Coast region. Though the work is hard, fraught and painful, I feel that the benefits to our region will be significant and justify the effort and investment.

Because past experience has clearly taught us lessons of what happens when we choose not to invest in this type of longer term planning, I hope that you will choose a path that leads to more constructive interactions and positive results.

If I can ever be of help, know that I am happy to try.

With gratitude for your hard and careful work,
- Peter

2330 NW Belgrave Ave.
Portland 97210
Peter_hayes@comcast.net

Submitted: Wed 09/30/2020 10:29 AM

We live here. Please stop your incursions into our drinking water, air quality, quality of life and quiet enjoyment. The timber lobby does none of these things. Support the HDF.

Thank you.

Richard Henry 248
81190 Sunset Vista Rd # 248 Arch Cape 97102
555rahenny@gmail.com

Submitted: Tue 09/15/2020 9:03 PM

I'm writing as a resident of Tillamook County and a professional forester to express my concerns regarding the Oregon Department of Forestry's (ODF) current proposal for a Habitat Conservation Plan (HCP).

I grew up like many in the area spending my free time in the summers recreating on the Tillamook and Clatsop State Forests, hiking, swimming, hunting, and fishing. I spent my summers through college working as a wildland firefighter to protect these forests from wildfire. I now work for a private timber company that supports its Tillamook mill and family wage jobs like mine by purchasing logs from State timber sales. I have enjoyed the spectrum of benefits State Forests produce, social, environmental, and economic. I understand that these values need to be balanced. The currently proposed HCP is not balanced. It focuses on the environmental aspect, locking 50% of the working forest land into wildlife reserves without considering the economic and social impacts to counties like Tillamook.

The currently proposed HCP will result in \$27.6 million in revenue lost to the State and Forest Trust Land Counties and hundreds of millions of dollars in lost income and opportunities for local businesses. Modeling shows this reduction in revenue will leave ODF roughly \$10 million short per year of what is currently needed to fund the agency's work to maintain economic and recreational values and to protect the forest from wildfire. This would require ODF to compete with schools and other social programs for general fund revenue.

I am disappointed that the Forest Trust Land Counties have not been given the opportunity to participate in negotiations to craft the HCP. The Tillamook and Clatsop State Forest is county land deeded to the State to manage for the counties. The current HCP has been pushed forward without county support. This is despite the State losing a \$1.1 billion class-action breach of contract lawsuit which concluded ODF failed to balance economic values for the counties. This lawsuit is accruing \$262,000 in interest per day and is being ignored by ODF.

Along with creating jobs, revenue to Tillamook county from ODF timber sales funds many social programs such as schools, libraries, and emergency services such as fire and law enforcement. I spent three years as a volunteer firefighter and saw the struggle of Tillamook county citizens with mental health and addiction. The County desperately needs more resources to address these issues and any reduction in revenue to the county by the currently proposed HCP would only exacerbate these issues.

I'm not against an HCP but it needs to balance the economic and social values for the North Coast Counties it impacts. In 2018 the Board of Forestry voted to pursue an HCP based on an analysis that demonstrated an HCP could maintain or even improve current harvest levels. The current HCP reduces State timber harvest by 25-30%. Our forests are a renewable resource that can provide the economic and social values needed by counties like Tillamook and still be environmentally sustainable. If an HCP is to be pursued by the Board of Forestry it needs to at

least maintain current harvest levels. The current HCP is unfairly asking counties like Tillamook to pay for environmental protections that supposedly will benefit everyone.

I appreciate the opportunity to comment.

Thank you.

Jacob Hilger

jakehilger797@gmail.com

Submitted: Mon 09/28/2020 9:12 PM

I am writing to voice my support for the OR State Forest HCP. I live in Nehalem and have for the past 8 years. My partner and I own a small vegetable farm. I feel the current plan is an appropriate compromise allowing OR to protect endangered species, precious waterways and the future generations of Oregonians via the carbon sequestering properties of forests. I depend of the landscape for a living and I understand that there are many opinions on how to best manage it. I feel that it is essential to pass the HCP to keep all parties accountable and allow for certainty and stability moving forward for all. I would also like to urge ODF to assign Habitat Protections Areas to our drinking water sources. It is essential that we have clean water and hugely important to protect it from potential contamination or pollution. As a young family planning to grow I am concerned about the health and longevity of our forests and our drinking water. Please pass this Habitat Conservation Plan

Kayleigh Hillert
19350 Barber Rd
farmers@moonriverfarmers.com

Submitted: Tue 09/29/2020 11:20 AM

As a coastal resident whose water supply travels through timber country, I am very concerned about timber practices in this state and encourage you to support and even expand the Habitat Conservation Plan to include protecting drinking water for not only fish but humans as well. Our future as a part of a viable ecosystem depends on the protection of habitats in forested areas, not only for the short term viability of endangered species but to mitigate the impact of climate change. Please, do not allow the financial interests of the timber companies to outweigh the profound impact of habitat elimination and climate change on not only the residents of Oregon, but the health of the planet. As a long-term Oregonian have been dismayed by the disproportionate impact of timber industry policies on the health and well-being of the people of rural Oregon and the environment. State lands should be off limits from profit and should be managed for the benefit of all Oregonians, including native salmon and other wildlife. If we don't conserve habitat now, who will? We owe it to our grandchildren to protect these irreplaceable resources. Please vote to support and expand the HCP.

Thanks,
Pat Himes
5375 Norwester Rd, Oceanside, OR 97134
pathimes2011@gmail.com

Submitted: Thu 10/01/2020 12:46 PM

Dear Board of Forestry:

Thank you for allowing me to share my opinion about your quandary to develop and implement a Habitat Conservation Plan (HCP). From reading at the Oregon.gov website, I understand the results of Phase 2 will be presented to the Board of Forestry (BOF) in October 2020. Upon receiving these findings, the BOF will make a determination to go forward to Phase 3 or not.

I full heartedly support your decision to move forward through the NEPA process (Phase 3), while engaging the public, to ensure water, wildlife, and our way of life may improve through sustainable habitat management of our forest resources.

Safe and reliable supplies of clean water cannot be stressed enough when I and the majority of the public think about conservation of our forests. By conserving and wise management of natural areas, forests, and wildlife and plant habitat, these lands help to filter out pollutants, which prevent toxins and runoff from eventually contaminating our streams, rivers, and lakes that bring us clean drinking water.

Loss of habitat for fish and wildlife is costly to our economy and steals cultural and spiritual legacy from future generations. One specific group of wildlife that are a concern to our local business, economy, and food security are the pollinators. Land alteration (i.e. development, habitat conversion, deforestation, spray herbicides) of millions of acres of land, vital wildlife habitat, has contributed to negative impacts on invertebrates like bees and monarch butterflies. Protecting and restoring these areas are critical to the survival of insects which ensure our crops are pollinated and are vital for our food supply.

A Habitat Conservation Plan will be a guide to conserve the resources that traditional livelihoods rely upon. Resilient coastal wetlands, fisheries, shellfish grounds, and working farms are conservation by-products of a well implemented HCP, which are valued strongly by folks in Oregon and throughout America. Protecting, conserving, and restoring habitat are linked to protecting our own health. Nature is a source of our food, important medicines, and for "getting away" or "relaxing"...for our mental health.

I hope the Board of Forestry will look beyond the cash value of our forests and incorporate the fact that if we do not take care of what we have left, it will cost more to restore our natural areas and water in the future. Oregon Department of Forestry (ODF) are our state agency which deals with natural resources. We, the public, have confidence you will proceed with the process of developing and implementing a forward-thinking Habitat Conservation Plan we can all be proud of supporting. No plan is perfect, not all partners will be happy campers. However, please remember wildlife, humans, land, and water are all connected and the mission of ODF is to serve the people of Oregon by protecting and promoting stewardship of Oregon's forests to enhance environmental, economic, and community sustainability. The time is ripe to make modifications in the way Oregon Department of Forestry has managed our land resources.

Makes us proud!

Nancy Hoffman
41205 Anderson Road, Nehalem, OR 97131
njhoff@hotmail.com

Submitted: Wed 09/30/2020 9:33 AM

Members of the Forestry Board

As a North Coast landowner and homeowner, I am writing now to support a Forestry Board vote to continue with ODF's HCP proposal, specifically with the inclusion of the ODF managed Norriston Heights/Hug Point parcel in this proposed plan.

Our Neighborhood has been working with ODF for over a year to protect this parcel on the northern Oregon Coast in the Arch Cape area. We are not part of a water district and runoff from this property is our neighborhood's only source of drinking water. Besides being a protected species habitat, this forested area provides over 20 homes along the Oregon coast with water from state granted water rights that date back to the 1970's.

Your vote in favor of permitting the ODF staff to continue its work on this plan, with inclusion of the Hug Point parcel in this plan, would be appreciated by all in our neighborhood.

Thank you for your work, and for your consideration on this important topic.

My best wishes,
Julie Holmes
81060 Arcadia Road
Arch Cape, Oregon 97110
julieholmes@cox.net
cell: 602-793-7694

Submitted: Fri 10/02/2020 11:18 AM

Thank you for the opportunity to comment on your progress toward adoption of a Habitat Conservation Plan (HCP) as part of the management system for the state forests of Western Oregon. I strongly support a HCP. I urge you to stay the course informed by the best available science in development of the HCP and as Habitat Conservation Areas are described and mapped. I look forward to the federal scoping process! As a former member of the Clatsop County Board of Commissioners and a native of Astoria, I've heard a considerable range of opinions regarding forest management. I understand the need for good jobs in forest industries and I appreciate the revenue counties and special districts derive from sustainable logging and processing of timber products. I also appreciate the value of these forests for recreation and inspiration, clean air and drinking water, habitat for fish and wildlife, biodiversity, and reduction of atmospheric carbon. These values and others need not be competitive. Our forests can thrive as we recognize the amazing abundance that is possible with cooperation rather than litigation. A Habitat Conservation Plan is by far the best tool to create relative certainty for both harvest and conservation long into the future.

Respectfully,

Peter Huhtala
12587 SW Bridgeview Ct
Tigard, OR 97223
peterhuhtala@gmail.com

Submitted: Tue 09/29/2020 2:17 PM

Many of us here in Rockaway have a great concern about the water we drink. And the forest practices we see on the hillside to our east side. As a recent resident of TroutLake Washington I know that their forest practices especially near water courses are much better than ours here in Oregon. We need to even the playing field.

Frank Imbrie
26773 white Dove Ave, Rockaway beach, or. 97136
Cfimbrie@icloud.com

To: Oregon State Board of Forestry
From: Greg Jacob, Environmental Representative,
State Forest Advisory Committee
RE: State Forestry Habitat Conservation Plan (SFHCP)
Date: September 27, 2020

Speaking for myself as someone who has watched the steady progress of the HCP over the past two years, I want to give my support to moving the HCP to Phase 3, the National Environmental Act process. I hope that the Board of Forestry on October 6 will move in that direction.

I support this HCP for the following reasons:

- Careful planning and work have been conducted on phase one, Initiation and Scoping and phase two, Negotiation Strategies.
- An HCP can reduce average annual ESA compliance costs by approximately 2.2 million dollars.
- Take prohibitions defined in Section 9, ESA, are strict, and parties can sue for non-compliance. On the other hand, an HCP will provide regulatory assurances and ODF can increase the predictability of its costs related to listed species.
- For two years Federal scientists have worked closely with the Oregon Department of Forestry (ODF) to design the conservation locations.
- The commitment is for 70 years, which enables ODF to make long-term plans and investments.
- 275,00 acres of state forests would be under the HCP terrestrial areas, and 77,000 riparian areas would provide 120 feet of buffer measured horizontally for type F streams, roughly half of the 640,000 acres managed by ODF.
- An HCP for Oregon's western forests will cover sixteen species—Coho, Chinook, Steelhead, Chum, three salamander species, Coastal Martin, Red Tree Vole, Marbled Murrelet, and Northern Spotted Owl.
- Admittedly, as more species become listed as threatened or endangered, there may be reduced harvest opportunities over time, but on other hand, an HCP will assure a more predictable rate of timber harvest over a 70-year permit and will reduce costs compared to the current site-by-site approach to ESA compliance.
- An HCP is in keeping with managing Oregon's forests for the "Greatest Permanent Value" that provides social and environmental benefits, as well as economic benefits, to the people of Oregon.

Greg Jacob
1331 NE Parkside Dr.
Hillsboro, OR 971214
503-747-8005
jacobgk@comcast.net

Submitted: Thu 10/01/2020 12:04 PM

Please support the the Western Oregon Forests Habitat Conservation Plan.
I thank ODF for its efforts in conservation, and the importance of continuing those efforts.

Protection of endangered species and forest conservation go hand in hand. We're for it!

Regards,
Don and Nancy Jarbeaux
Tigard, OR
djnwgm@gmail.com

Submitted: Thu 09/03/2020 8:40 AM

Dear Oregon Board of Forestry,

As a Clatsop County resident, I am concerned about the approval of the HCP that ODF is proposing. Any plan that is not balanced should be of concern to forest managers and the Board. Here in Clatsop County, each one of our schools' gain revenue from timber harvest on State Forests. We currently have over half of the students at each school living under the poverty line. Our county needs to make sure that an HCP does not threaten funds to these schools – and by all accounts it would. Reducing harvests not only would affect our schools but our rural community as a whole. The trickle down of jobs lost in our community would be immense.

Additionally, as we are currently in fire season here in Oregon, we have seen what happens to large portions of land that are set aside and not managed. They become prime locations for forest fires due to disease, decay and overcrowding. Lack of forest management in these areas also means that there will be no money to pay for the upkeep of the roads in these no harvest areas. Loss of drivable roads and good access also means that when a fire occurs the proper equipment can't get in to extinguish the fire.

Please consider that a sustainably managed forest can also provide many benefits to wildlife without large areas set aside. Whose to say that wildlife will use those areas set aside for them? What happens when they decide to live in an area that is not set aside for them? They don't live by a map with lines telling them where to live. They move around as they please.

Lastly, it was in the news that within the last year a judge ruled that ODF must manage for economic benefit of the counties. This was based on the original reason that the counties deeded the land of ODF. Wouldn't an HCP be counter intuitive to the result of that litigation?

Thank you for your time.

Jenny Johnson
Clatsop County

Sincerely,

Jenny Johnson
92080 John Day River Rd
Astoria, OR 97103
bugsyjcl@gmail.com

Submitted: Wed 09/30/2020 4:12 PM

Re: Habitat Conservation Plan

I want to support the creation of a Habitat Conservation Plan (HCP) covering state forestlands west of the Cascades. Critical issues that affect all of our lives need study and planning: pesticide reduction, drinking water assurances, endangered species protection, sustainable forestlands, climate change and carbon storage, and creating more diverse public forests are among them. Those of us who live close to public forestlands need a broader and longer term vision for state forests. I am concerned about the size and frequency of clear-cuts as well as overuse of pesticide mixtures that have never been tested for safety. I believe that we can do a better job in balancing the economic benefits of timber harvesting with community safety and stewardship of an increasingly threatened ecosystem. Please move forward with an environmental impact statement. Our lives and future should not be compromised for short-term gain.

Thank you.

Bob Joondeph

1530 Hillcrest Ave, Oceanside, OR 97134

bojjoondeph@gmail.com

Submitted: Thu 09/03/2020 9:49 AM

Dear Members Board of Forestry,

ABSOLUTELY NO on the so called 'habitat conservation plan'. This is absolutely ridiculous. Unharvested timber creates WILDFIRE situations. THAT has been proven across the entire NW United States. Without a BALANCE of harvest and regrowth, the forests will burn and then where is the clean water and wildlife?

This plan will further devastate the rural communities that depend on forestry for a living. The spotted owl catastrophe in the 1980's left communities financially devastated. This so called "plan" would cause further devastation to the rural families that depend on RESPONSIBLE FORESTRY for their living. These families DEPEND on these jobs for THEIR survival. Wildlife habitat is doing just fine on the North Coast.

Please do consider the PEOPLE in these rural communities and THEIR financial survival. Please remember that TREES are a crop and can be regrown. Oregon's tree farmers, including the large corporations, harvest and replant. This creates several different kinds of 'zones' that wildlife currently thrive in.

This is why I'm writing to ask that you protect Oregon's forest INDUSTRIES and the family wage jobs that PEOPLE need now more than ever. Especially during and following the pandemic.

FIRMLY, I am employing you to NOT FOLLOW THROUGH WITH THE HABITAT CONSERVATION PLAN.

Sincerely,

Carole Kelley
75525 Price Rd
Rainier, OR 97048
carolekelley59@gmail.com

Submitted: Monday, September 28, 2020 8:17:05 PM

Members of the Board of Forestry,

I write to you today to urge you to move forward with the State Forest Habitat Conservation Plan for Western Oregon.

I am deeply concerned about the climate crisis, both because of the effects on communities, such as heat-related illness and increased wildfire, and because of the effect on endangered species that need a stable climate for their survival. This plan, while not perfect, can be one of the cornerstones for improving the climate resiliency of state forests.

This plan is a compromise that will ensure that large areas of forest that are refuges for endangered species and are exceptionally carbon dense will be protected from commercial logging. These protected areas in the HCAs and RCAs will both maintain habitat, which will help climate stressed species survive, and provide significant carbon storage on state lands while also ensuring clean drinking water for communities. In exchange other portions of the state forests will be less encumbered, and management planning should be a smoother process. I believe that management should also prioritize carbon storage on state lands as a goal, but that is a discussion for another day.

This compromise also will save money for the State of Oregon and improve relationships between the state, the timber counties, and environmentalists by improving certainty and reducing litigation and survey requirements. Currently the state spends \$2.5 million annually to survey and avoid endangered species habitat, money that would be better spent on productive forest management.

More details will need to be hammered out in the NEPA process, but we believe there is enough information now to move forward with this plan. We appreciate the transparency, and we hope that the Board does not allow this moment to go to waste.

Sincerely,
Felice Kelly
350PDX Forest Defense Team
felice.kelly@gmail.com

Submitted: Wed 09/30/2020 2:24 PM

Dear Members of the Oregon Board of Forestry,

The HCP is a great first step in conserving our coastal forests. The plan represents a workable compromise that balances timber harvest with fish and wildlife habitat, recreation, and clean water. I have been concerned for the environment, and all of its species, for all of the 42 years I have lived at the Oregon coast, and to have a step in the right direction is monumental. This is a critical moment in the midst of MANY critical moments. Let's step forward, please. Thank you for your time in moving this forward.

Sincerely,
Jude Lally
31972 E. OCEAN LN. Arch Cape, Or.
tevisdiii@hotmail.com

Submitted: Wed 09/30/2020 9:33 PM

I'm sending you my opinion as a citizen and as someone who is concerned for the future of our planet. Please vote YES on the Western Oregon Forests Habitat Conservation Plan, and support the staff recommendation to finalize the administrative draft of the HCP and move into the NEPA process. (I'm a retired technical editor at CH2M HILL so I know how long all this takes.) If we don't seriously protect the other species that live here, we are doomed. It's not just the pretty trees. It's clean air and water, and perhaps especially our Northwest iconic fish, the salmon. I know compromise is the only way forward at this point in history, so a well-thought-out HCP is the best way forward to achieve multiple goals including species conservation, clean water, recreation and sustainable predictable harvest. This is even more critical, given the horrendous wildfires that are ravaging these forest habitats every year. We'd better take care of what's left.

I hope the Oregon Department of Forestry will be allowed to finish their work on this important plan.

Thank you.

Lyn Larson
Corvallis

Submitted: Sat 09/05/2020 2:48 AM

Dear Board Member Board of Forestry,

The state is currently considering an HCP that will destroy jobs and further ruin our rural economies by needlessly locking up thousands of acres of state lands from timber harvest. Please reconsider!

For the health of our forests and for our rural economies, we need actively managed forest that provide a variety of benefits ecologically, socially, and economically. We CAN manage forests responsibly and protect environmental values while still harvesting timber and enjoying all the economic benefits of active management. Please reject the current HCP draft plan and seek a balanced solution!

Regards,

Roger Lord

8153 SW 171st Pl

Aloha, OR 97007

Roger.Lord.302619757@p2a.co

Submitted: Thu 09/03/2020 10:06 AM

Dear Board Members, I am aware that you're in the process of making a Habitat Conservation Plan for our state forests and I Thank You for considering more than just timber sales. This plan will have an impact on western Oregon ECOSYSTEMS and true forests for decades to come. This is an immensely important decision, and I'm writing today to ask you to make sure that this plan ensures reasonable and reliable ECOLOGICAL consideration. Saving some of Oregon's forests as a Nature Preserve will serve so many important functions - including allowing our children and their children to see what a true forest looks and smells like. Wildlife habitat is vanishing at an astonishing rate. And, as you well know, trees remove excess carbon dioxide from the air and store it as nothing else can. Please, for the future of all Oregonians, give Oregon's Forests a chance to become the nature preserves that they need to be. Please protect our rural communities that rely on state forests for critical RECREATIONAL uses, WILDLIFE preservation and CARBON REDUCTION. Now is THE TIME TO PRESERVE A SMALL AMOUNT OF WHAT REMAINS OF OREGON'S Remarkable State Forests. Thank You for taking the long view. It's imperative right now to save what we can. We can increase harvests again in our grandchildren's future. Saving some of Oregon's forests will allow them to have a more beautiful future.

Roxanne Magnuson
EqExRoxx@wvi.com
503-569-4138

Submitted: Tue 09/29/2020 9:17 PM

Dear Board Members,

We cannot carry on with "business as usual" in our forests. We need to prioritize using them to sequester carbon, protect habitats for endangered fish, birds and wildlife and to keep our drinking water clean over timber production at this point. Their long-term viability, and ours as well, depends on it.

I want to see a plan that implements the goals set out in Executive Order 20-04, a plan that uses best science and traditional Indigenous forest practices to insure the on-going health of our forest ecosystems and the ongoing health of our state. There are other alternatives to timber, there are no alternatives to forests.

Thank you,

Bel-Ami Margoles

belami608@gmail.com

Submitted: Thu 10/01/2020 11:09 AM

Hello,

My name is Hayden Marsh; I have been a Portland resident for the past 4 years. My husband and I love living in Oregon because of the vast wild beauty and the protections afforded to the wild animals living here. These days, especially with climate change threatening not just humans but the animals vital to our ecosystem, we must be willing to do more to protect our natural resources and the animals who compose it.

I am writing today to urge the Board of Forestry to continue to advance the Western Oregon Forests Habitat Conservation Plan. This plan is crucial to creating a safe haven for our wildlife. Please support the staff recommendation to “finalize the administrative draft of the HCP and move into the NEPA process.” The Habitat Conservation Plan is the best method for creating durable habitat protections for imperiled species such as salmon, steelhead, Marbled Murrelets and Spotted Owls. Now more than ever Oregonians (and Americans) must push forward plans that protect species conservation, clean water, recreation and sustainable predictable harvest. Knowing the Habitat Conservation Plan is on the table, being discussed and pushed forward is a huge relief as a young millennial, newly pregnant, concerned about what the future will look like not only for myself, but for my children. I want them to be able to raft the John Day river or hike Mt. Hood or visit the Wallowas knowing there are dedicated folks protecting Oregon and the precious species that inhabit it.

Thank you to ODF for your continued dedication and work on this plan. Please continue what you've started for all of us.

Best,

Hayden Marsh

haydenlawler1992@gmail.com

Submitted: Thu 10/01/2020 7:46 PM

I urge the Board to move ahead with the proposed Habitat Conservation Plan which has been developed after considerable thought and passionately professional analysis. I am one of many citizens living in Clatsop County who value not only the endangered species but the many other critters and plants which they represent—much like the proverbial canary in the coal mine. Some attempt to diminish the significance of wildlife, ridiculing a concern for our old forests in their desire for industrial plantations which produce continuing profits for a limited number of businesses.

We must learn to value a balanced approach to Oregon's forests before we tip that balance beyond the point which it can be saved. I understand the attachment to traditional occupations passed (usually) from father to son. Automation has taken its toll and change is difficult. But the need for clean streams and water supplies, the health of salmon and other fish, and a need to avoid further ocean warming make the steps you can take of great importance to all of us. Please continue the HCP on its path of progress with your action on October 6th.

Jan Mitchell
362 Duane
Astoria, OR 97103

Submitted: Sun 09/27/2020 8:49 AM

I live within the Scenic Waterway designated area of the Nehalem River in Tillamook County and I support the Oregon Board of Forestry's proposed HCP to protect our forest lands of at least 640,000 acres for 70 years. Please place the drinking water sources of the coastal communities into Habitat Protected Areas also.

Submitted: Thu 09/24/2020 10:45 AM

I would like the Oregon Board of Forestry to develop a Habitat Protection Plan for the Tillamook and Clatsop State Forests to protect endangered species and other wildlife, protect our watersheds, do sustainable forest practices, allow more diverse and old growth trees and stop pesticide spraying and clear-cutting especially on steep slopes. Long-term effects must be considered, especially due to climate change and carbon storage issues. Thank you for your consideration.

Diane Monico
36005 Foss Rd, Nehalem, OR 97131
dmmonico@yahoo.com

Submitted: Fri 10/02/2020 1:13 PM

Board of Forestry,

It is important to the health of Oregon forests that as much forest as possible be spared from logging, the current proposal represents compromise, and is a reasonable plan. For wildlife, forests and future generations I ask that the board support saving 640,000 acres by adopting the proposal. Thank you for all your efforts.

Mark Nelson
563 4th st po341
neo@neosurreal.com

Submitted: Wed 09/30/2020 4:02 PM

Dear Oregon Board of Forestry,

Thank you for inviting public comment on the Oregon Department of Forestry's proposed Habitat Conservation Plan for the Tillamook and Clatsop State Forests.

I support the proposed HCP, with the important caveat that I hope that in the HCP, the Oregon Department of Forestry will please include a note that ODF does not necessarily recommend the HCP as a model for private forestlands.

I offer this caveat from my understanding that regardless of the nature of incentives and disincentives for conservation on public land, HCPs (like Safe Harbor Agreements and Candidate Conservation Agreements with Assurances) do nothing to dispel regulatory disincentives for conserving or maintaining existing populations of any species (whether or not listed under the US Endangered Species Act). Specifically, HCPs (like SHAs and CCAAs) require a "baseline" assessment for any existing populations of species covered by the agreement and obligate landowners to avoid "taking" these populations, as though listed under the ESA, whether or not any of the covered species are actually listed. I fear this aspect of HCPs (and SHAs and CCAAs) could be counterproductive to the conservation of species whose survival depends on actively managing private land (such as to control invasive exotic vegetation or "succession", such as for the many species associated with the Willamette Valley's upland prairie and oak-dominated habitat). By extension, I fear that if people unquestioningly assume HCPs are good for private landowners, such agreements (and the pressure to adopt them) risk worsening the fate of such species in the name of saving them.

For background about this concern and some strategies to address, I offer by reference a master's thesis I completed to address this issue. For background here, I offer the following abstract for this work, with a link for a copy that is freely downloadable from the University of Oregon. (My views are of course my own.) In this work, I discuss HCPs in particular at pages 49-55, in part citing Benton County's recent HCP for upland prairie species and the remarkable action that Benton County took to address this issue within its HCP.

Thank you very much for your consideration.

Sincerely,

Adam Novick
3715 Donald St.
Eugene OR 97405
V: 541-345-0467
E: adam.p.novick@gmail.com

PS. Said abstract:

Novick, Adam P. 2013. "Risk to maintenance-dependent species from orthodoxy in species-based land-use regulation." Master's thesis. University of Oregon.
<http://hdl.handle.net/1794/13343>

I theorize and offer some evidence that humans inadvertently risk exacerbating the loss of maintenance-dependent species on private land by using species-based land-use regulation to seek other benefits. Drawing evidence primarily from the US, I argue that such regulation poses a risk to maintenance-dependent species, that humans routinely disregard this risk, and that this disregard widely serves to defend the power of individuals and organizations to use such regulation to seek other benefits. I suggest this implies that with constraints on public funding, humans might improve the survival of some species by clarifying the purpose of such regulation and considering openly refraining from such regulation for some species. I also suggest such change might depend on articulating the issue as whether the survival of a species could ever depend on individuals [i.e., everyone] having a right to conserve or maintain it without selectively incurring harm from regulation intended to save it.

Sincerely,
Adam Novick
3715 Donald St Eugene, OR 97405-4729
adam.p.novick@gmail.com

Submitted: Thu 10/01/2020 4:31 PM

Please do everything you can to save our forests. Now because we have lost so much with our fires, it is so much more important.

Jane Olsen, A long time Oregon resident
olsenjane50@gmail.com

Submitted: Thu 09/03/2020 2:16 PM

Dear Members Board of Forestry,

The only thing this will do is create a west-side tinder box much like the forest to our east side. With out active forest management the area will also lose the road system that offers recreational opportunities. By putting up more timber sales in other areas to offset lost revenue it will create pockets of over-harvested timber, thus will give the ODF a negative public view and result in more environmental scrutiny. Fifth generation logger here, I've watched as well meaning programs have decimated forest and wildlife. This will be the beginning of the end of the ODF stewardship and create another tax funded agency instead of the only for profit agency in Oregon government.

Sincerely,

Matt Olson
14835 NW Timmerman Rd
Forest Grove, OR 97116
matt.olson20@gmail.com

Submitted: Thu 10/01/2020 2:10 PM

Hello,

I'm writing to urge you to support the Habitat Conservation Plan concerning ODF-managed forests west of the Cascades. Such conservation is essential today. A look at the devastation of private timber land here is proof that we must set aside public lands as compensation (and drastically modify the way private, and public, land is logged). Our watersheds deserve conservation status, as does our wildlife, including endangered species protected by state and federal law. Also, this year's frightening wildfires should persuade us to better manage our forests, and keep them standing as we attempt to fend off the worst of human-made climate change (carbon sequestration). Please move forward with this plan, for future generations of Oregonians, instead of satisfying the short-term demands of those who only seek profit from our incredible forests. Our timber communities deserve assistance and the opportunity to evolve, but not at the expense of our last-remaining stands of state-managed forest. Let's move on.

Thank you,

Daniel O'Neil

77dvo77@gmail.com

Submitted: Wed 09/30/2020 11:17 PM

Please support the Habitat Conservation Plan, as it would set aside 640,000 acres for conservation purposes and for endangered species. As of now, the ODF often harvests aggressively in conservation areas, with little analysis and for the goal of timber production. The current ODF practices of clear cutting and spraying land that is not under set aside under the plan will be allowed to continue. (Although it is my personal hope that these practices will be reformed to more modern, sustainable means as soon as possible). We need to think beyond monetary means and make decisions that protect our forests and the people, as well as the wild plants and animals that depend on them. It is important as Oregonians to be able to recreate in forests and pass on forested lands and the native plants and animals that we identify with as Oregonians to future generations.

Thank you.

Lori O'Neil

driftawake@gmail.com

Submitted: Wed 09/30/2020 1:46 PM

Thank you for taking our comments.

My parents and I have owned a home at the above address since the early '70s. As a property owner I urge you to adopt the HCP plan which would set aside thousands of acres of forest lands. I am strongly in favor of this. With the threat of climate change, the destruction of old growth, and the elimination of wildlife habitat, actions must be taken now to reverse the clear cutting of these lands. The HCP would offer a compromise; schools and rural counties would continue to receive funding and loggers would still be employed albeit at a lesser scale. Other jobs could be created in the wise thinning of the forest and in clean-up and restoration projects. I'm also very concerned of the spraying of chemicals in the Agate Beach, Wheeler and Rockaway areas. Timber companies are endangering our lives, and the lives of their workers who spray these toxic substances. We know that water supplies are currently being contaminated. This has to stop, now. The ODF needs to add the HCP to the drinking water sources of these communities. There is current research regarding forest management which supports thinning of trees instead of clear cutting. Leave some of the large trees so that they can support young trees in their growth. Leave areas of trees for the same reason instead of wanton clear cutting. The large trees sequester so much carbon dioxide from the air we breathe; when they are cut down the CO2 is released back into the environment. Climate change is here; we all must make intelligent choices to reverse its devastating effects. I implore you to adopt the Habitat Conservation Plan and set aside forest lands.

Thank you for your consideration.

Nancy A. Osborne

18840 Pacific St. Rockaway, OR 97136

nancyaosborne@comcast.net

Submitted: Fri 10/02/2020 11:59 PM

Re: HCP Board Decision

With regards to the Draft Western Oregon State Forest **Habitat Conservation Plan (HCP)**, **I am commenting in support of efforts by the North Coast Communities for Watershed Protection** (healthywatershed.org) for the approval of the Draft HCP in order to proceed with EIS submissions.

On a personal note, my relationship to the North coastal forest communities spans several decades of experiencing multiple aspects of recreation including birding, fishing, hiking, surfing, hunting, boating, photography, raising my children to appreciate and respect the diverse richness of this unique natural environment. As homeowners in Manzanita, my family and I are deeply concerned that without the adoption of protections of the HCP, the health of Oregon's watersheds along the North coastal forests are at risk of degradation by current management practices including clear cutting and introduction of toxic chemicals to sensitive habitats. The coastal communities are in dire need of these conservation management actions to protect livelihoods, as well.

In accordance with the ODF's Mission statement with regards to the **Greatest Permanent Value** rule, the draft Plan must consider and promote "healthy, productive and sustainable forest ecosystems that over time and across the landscape provide a full range of social, economic, and environmental benefits to the people of Oregon." **The draft Plan appropriately addresses and supports the list of benefits under this rule.**

I understand that the ODF Board is responsible for periodically reviewing the Greatest Permanent Value with regards to "current, social, economic, scientific, and silvicultural considerations." As Oregon and the entire Pacific Northwest is currently in the national/international spotlight for issues relating to all of these considerations, people are looking for commitment among government, scientific communities and industries to find compromises in order to approve the best choices that will enhance the Greatest Permanent Value for all Oregonians. In addition, it is an opportunity to make a public statement regarding conservation components of climate crisis issues. This is a huge moment not to be underestimated or dismissed.

This year has shown that the North coastal forested areas are well-loved and well-visited by a plethora of outdoor recreationalists and tourists, particularly the Tillamook and Astoria Districts which hold most of the habitat conservation area forests.

People from throughout the Oregon, PacNW and throughout the U.S. & international traveled to Oregon's coastal forest region to experience first hand the pristine waters and vast forested lands rich with wildlife, birds, fish and marine mammals that all depend upon a healthy, well-managed watersheds. The coastal forest communities depend heavily on the surrounding natural environment to sustain local/regional economies and local quality of life, most of which directly depends upon the health of the natural ecosystems that the HCP will manage.

Please approve the HCP for the benefit of all Oregon residents, including all humans and all wild species, terrestrial, avian and aquatic.

I sincerely thank you for considering my personal comments as well as my support of the efforts by North Coast Communities for Watershed Protection to support approval of the HCP.

Katie Person
327 N 2nd Street
Manzanita, OR 97130
206-240-4385
kjmperson@icloud.com

Submitted: Fri 10/02/2020 1:09 PM

Board of Forestry,

HCP Board Decision Proposed State Forest Habitat Conservation Plan Please find the attached comments regarding the Board's upcoming deliberations on the proposed State Forest Habitat Conservation Plan. These comments are submitted by the Lower Nehalem Community Trust.

Thank you,

Ben Pittenger

Executive Director Lower Nehalem Community Trust

532 Laneda Avenue, Suite C, Manzanita, OR 97130

ben@nehalemtrust.org

Submitted: Wed 09/30/2020 1:33 PM

Thank you for taking our comments.

I am writing to thank you for your work on the Western Oregon Forests Habitat Conservation Plan. Our forests and native species have never been more important, especially given the recent losses due to fires. Please continue your very important work with this plan, and advance to the next step in the process. I ask to accept the recommendation of staff and finalize the administrative draft of the Habitat Conservation Plan, moving forward into the NEPA process. This is the best way forward for the health of our local ecosystem, while compromising to allow for other uses.

Thank you so much!
Erica Poole
poole.ej@gmail.com

Submitted: Sat 09/05/2020 3:23 PM

Dear Chair Tom Imeson,

The Oregon Dept. of Forestry is a government agency funded by all Oregonians which should, should, be performing its duties for the benefit of the majority of Oregonians. But it is not!

Sadly the ODF has a long history and continues today funded by all but serving the logging corporations, the minority. ODF has allowed way too much unsafe, unhealthy pesticide spraying...for the corporations' benefit. ODF is rapidly denuding the Coast Range and other areas as they continue to clear cut excessively large acreages of OUR forest lands ...for the corporations' benefit. ODF has and continues to allow logging that damages public water supplies...for the corporations' benefit. ODF has and continues to manage forests as tree farms ignoring the many other highly valuable values provided by intact, multi-age forests...for the corporations' benefit. ODF has participated in suppressing, hiding, State-funded graduate and other research that shows logging burned areas is a negative action...for the corporations' benefits. ODF has and continues to manage for minimal recreational values [salmon fishing, wilderness hiking, camping] thereby damaging the economic yields for small, coastal communities...for the corporations' benefit. ODF has overwhelming supported timber corporations needs over publicly drive/funded conservation organizations' needs ...for the corporations' benefits.

At 73 years old I am fed up with OUR Dept. of Forestry. We pay the freight and get the shaft! It is way, way past time for changes in the Forestry Commission and ODF top leadership.

Compared to forestry practices in Washington and California, Oregon is very deficient. Oregon supports big forests with a tree on our license plate but not in its Forestry agency.

I ask that Gov. Brown and all concerned take significant, yes "meaningful", actions to without delay bring balance to ODF's actions - as listed above.

ODF must be forced, yes "forced," to stop skirting around and avoiding issues. Serve the majority of Oregonians, please.

I also formally ask that this email be forwarded to Gov. Brown's office. I await her office's response.

Sincerely,
Mr. Dave Potter
3930 Rio Vista Way Klamath Falls, OR 97603-7729
kpottermom@yahoo.com

Submitted: Wed 09/30/2020 10:41 AM

I encourage the Oregon Board of Forestry to adopt the Habitat Conservation Plan. Clean drinking water and protection of the Oregon State Forests west of the Cascades is crucial to the business economies, natural beauty, wildlife, and native fish runs that our small towns and rural communities rely upon for economic success.

Thank you.

Sincerely,
Patrick J. Rock
Salmonberry Saloon Salmonberry Commons
380 Marine Drive, Wheeler, OR, 97147
patrick@salmonberrysaloon.com

Submitted: Thu 10/01/2020 7:21 PM

Dear members of the Board of Forestry,

I have attended the online meetings on the Habitat Conservation Plan and I support its adoption by the Board. I believe it is a solid approach for the health of the forest and its species while providing the greatest long-term economic benefit for the state and the counties.

It seems inevitable that representatives of the forest industry resist the plan and perceive it as a taking away of what they perceive is rightfully theirs. I hope you will agree that it is absolutely not a zero sum game and in fact will work to the benefit of all interests.

I urge you to give the Habitat Conservation Plan your approval.

Respectfully yours,
Roger Rocka
362 Duane Street
Astoria, OR 97103
rogerrocka@icloud.com

Submitted: Wed 09/30/2020 2:18 PM

Greetings Board of Forestry Members,

Please continue to pursue work to complete the Habit Conservation Plan for the coastal forest lands you manage. The Conservation Plan will represent the Oregon Department of Forestry's continued commitment and responsibility to both the Oregon economy and native species in its purview.

Thank you,
Terre Rogers
Molalla, Oregon
terrorfly@gmail.com

Family user of forest products and recreational opportunities, including fishing for native coho, steelhead and chinook in Oregon's coastal streams.

Submitted: Sun 09/27/2020 8:47 AM

Please put me on record in support of the currently proposed HCP. As a resident of the North Oregon Coast, I witness the effects of industrial logging in our forests. Clear cutting of timber has degraded wildlife habitat, stream health and drinking water quality to coastal communities. For the sake of all residents, visitors and the health of our state as a whole, I urge you to create broader and more lasting protections for our forests and streams. Thank you for moving this plan into action.

Mary Ruhl
486 Upland Dr Manzanita, OR
cardoons@nehalem.tel.net

Submitted: Wed 09/30/2020 5:03 PM

Please enter my comment in the materials for BoF's Oct 6th meeting.

Dear Board Members:

I urge the Board to approve the Phase 2 draft HCP and move to Phase 3. It's taken a tremendous amount of effort to get this far. It's time to move forward.

Thank you,

Pete Sandrock

Great grandson of Oregon homesteaders

Retired Navy Officer

Former Benton County District Attorney

Submitted: Thu 10/01/2020 5:38 PM

Dear Board of Forestry,

I respectfully request the Board of Forestry advance the Western Oregon Forests Habitat Conservation Plan. I'd hate to see 2 years of hard work be for not.

The Habitat Conservation Plan seems to be the best way to achieve multiple values important to all parties. For example, species conservation, clean water, recreation and a sustainable predictable timber harvest.

I support the staff's recommendation to finalize the administrative draft of the HCP and move into the NEPA process.

Lastly, I'd like to thank the Oregon Department of Forestry for its work on this plan and I urge them to complete the work.

Sincerely,
Rick Sany
Portland, OR 97215
usii2008@yahoo.com

Submitted: Fri 10/02/2020 10:01 AM

Oregon Board of Forestry:

I have been an Oregon small woodland owner for over 40 years and close friend with a federal forester for 30 years. It is well past time to fully manage our forests for commerce and protection from wildfire.

I have seen litigation used as a weapon against efforts to manage our forests. While I support the setting aside of selected "Old Growth" and protections for wildlife, we should not confuse that with management of merchantable timber. We have allowed misguided litigious groups to hijack our economy and economic future. Many once thriving timber towns are now struggling communities. Surely you recognize that the pendulum swung too far in one direction. It is important to open our forests to a balanced approach and create opportunities for small operators and rural communities.

We should respect all points of view, but we cannot allow the continued use of the courts as a veto over our need to manage our forests. A managed forest will generate commerce that can revitalize a diverse rural economy and make all of Oregon stronger. Forests can provide the revenue we need to manage them.

Thank you for your consideration

Steven Schmunk
Springfield OR
541-912-2001
spschmunk@comcast.net

Submitted: Wed 09/30/2020 10:23 PM

Dear OCF board,

I am writing in support of vulnerable species in Western Oregon. I also understand that many factors and interests require balance, and it is your job to facilitate forest and wildlife management in our state. From what I've seen, the Western Oregon Forests Habitat Conservation Plan helps secure the needs of our wildlife in challenging times for us all. Please move it forward at your next meeting. Oregonians will surely appreciate real action taken when our resources seem so impermanent. You can show a way forward, and help bring residents from all over Western Oregon together.

Thank you for your work, and your consideration.

Charles Schulien, Portland, Oregon

cschesss@hotmail.com

Submitted: Sun 09/13/2020 12:48 PM

Please cut all the timber possible on state forest lands. Do not implement a conservation plan or any other plan that would reduce the income to communities and state and local entities. Please attempt to reduce bureaucratic requirements. The disastrous fires in Oregon have been devastating to communities. You legally can and should help the citizens of Oregon.

Helen Scott

5411 Averill Dr., Grants Pass, OR. 97526

Hscott@integra.net

Submitted: Tue 09/22/2020 10:50 AM

Dear Oregon Board of Forestry,

I am writing to urge the Board of Forestry to reconsider the plans to place 50%, or 331,000 acres of Oregon's forestland, into a wildlife reserve. I believe this plan is contrary to the 1941 agreement that requires Oregon to manage the forests for "the greatest permanent value of those lands to the state." Significant acreage of our forestland is already in wildlife reserve. We need a balanced approach to the management of our forest, which must also include recreation and sustainable harvest. All are an important part of maintaining a healthy forest that benefits all Oregonians.

Placing 50% of our forestlands into a wildlife reserve puts our forest at risk. We have seen the devastation from fires over the past few weeks be compounded by poor management of our State and Federal forest. Our forest needs to be actively managed through harvest, thinning and control of understory brush and litter. Placing additional land in a wildlife reserve makes this management more difficult and will exacerbate the dangerous conditions that now exist on much of our State and Federal lands.

At a time when our State budget is facing challenges due to the pandemic, we should not be considering a plan that will jeopardize our ability to fund management of the forest and our rural school and county governments. The north Oregon coast alone stands to lose 25-30% of its production from current levels. It is estimated that state and local governments will lose over \$27 million per year. This will result in a significant loss to the Oregon Department of Forestry as 35% of this revenue goes directly to ODF for management of the forest. This will require ODF to ask for funds from the general fund in order to meet its obligations— money the State of Oregon does not have at this time.

The State recently lost a \$1.1 billion class-action breach of contract lawsuit which concluded ODF failed to maximize harvest revenues. The interest charges accruing on this judgement while the State keeps dragging out appeals is over \$262,000 a DAY in interest charges, that if the State loses, will mean millions more in general fund costs. A plan to further reduce harvest at this time makes no sense. The loss of jobs and income due to mill closures and reductions, plus the loss to industries that support these efforts in local communities, will total hundreds of millions of dollars in a permanent hit to our economy.

Please reconsider. Oregon simply cannot afford this plan.

Sincerely
Max Sherman
Hebo, OR
maxsonsherman@gmail.com

Submitted: Mon 09/21/2020 10:11 PM

Dear Oregon Board of Forestry,

Oregon has a reputation for being a green state - filled with people who recycle, ride their bikes, and love to hike and fish. But is it? When it comes to forestry practices, the evidence shows that Oregon is not protecting its water, wildlife, or communities.

There are 10.6 million acres of private timberland in Oregon. That's one-sixth of the entire state. Yet the laws to protect clean water and public health on these lands are far less protective than on federal lands, and less protective than in California, Washington, and Idaho.

Oregon's own science team and two federal agencies said in 2015 that Oregon's rules on private forests do not protect clean water for people, fish, or wildlife. In 2016, these federal agencies withdrew grant money to Oregon for failing to keep forestry practices from polluting coastal streams.

It's time for a change. It's time for Oregon's laws to catch up with Oregon's values.

The timber industry operates profitably in California, Washington and Idaho under more stringent rules. Oregon needs to comprehensively reform the Oregon Forest Practices Act to: 1) require standing tree buffers along all streams; 2) ban clearcutting on steep, unstable slopes that are prone to landslides; 3) ban the most toxic herbicides; and 4) reform the Oregon Harvest Tax so that communities -- not industry -- benefit from private forestry tax revenue.

Thank you for your prompt attention to this matter.

Sincerely,
Dalton Sherratt
3534 SE Paula Jean Ct Hillsboro, OR 97123-5325
daltonsherratt@everyactioncustom.com

We are Bob and Bonnie Shumaker, small woodland owners of 160 acres of forestland in Western Washington County. We bought the original 40 acres in 1977, an adjacent 40 in 1997 and the final 80 acres in 2017 that put our original homestead back together. During this time, we learned as much as we could about good forestry. We are active in Oregon Small Woodlands Association, became Master Woodland Managers, and our forest is certified under the Oregon Tree Farm System. Bonnie also served 3 ½ years on the Committee for Family Forestlands, an advisory committee of the BOF.

In 2002, we attended an educational tour of the Tillamook State Forest and learned about Structure-Based Management where the forest would be brought to specified spatial distribution of stand types within the earliest time frame while providing non-declining harvest flow, consideration of threatened and endangered species, net present value and the Oregon Forest Practices rules. It made sense.

In 2018, the BOF asked the State Forests Division to review the Structure-Based Management Plan. In our reading of the Staff Report of the NW Oregon State Forests Management Plan dated March 6, 2019, we found the four key concepts remained: Active management for forest stand types, habitat values, key structural components and social and economic benefits. Added to these were active management for sustainable harvest and flow of revenue, enhancement of aquatic ecosystems and current and future effects of climate change. After a public comment period, the Board entered the draft plan into the public record at their April, 2020 meeting. We cannot tell if a decision has yet been made on the revised plan, but it continued to make a lot of sense.

Enter the formation of a Habitat Conservation Plan that the state hopes will improve certainty regarding compliance with the Endangered Species Act while managing state forests for economic, environmental and social benefits. After the completion of Phase 1 of a business case analysis, in November, 2018, the BOF directed ODF to enter Phase 2; Strategy Development and Stakeholder Engagement. Phase 2 is now available for comment.

Of concern to us is the forecast of reduction of logging for up to 60 years with perhaps 60% of state-owned forest becoming unavailable for logging during this time. In this 75-year plan, after this initial reduction, harvest would climb. Leaving so many acres untouched for so long raises concern for increased fire danger and disease. When you think about it, sixty years is more than two generations of working families. Reduction in harvest for this amount of time is unacceptable to those who work in the woods, the mills and the rest of the local economies that rely on them.

The reduction of revenue to counties during this time is also unacceptable. In November 2019, the courts ruled in favor of Oregon counties that the 1941 Forest Acquisition Act constituted a contract between the state and the counties, and that the state had not lived up to the harvest portion of that contract. There will likely be appeals, but the Habitat Conservation Plan even further reduces harvest, especially in the short term. This does not make sense.

Structure-Based Management in its 2018-19 draft revision should be the basis for the HCP. It addresses the same issues that the Habitat Conservation Plan tackles of consideration of threatened and endangered species. It also provides non-declining harvest flow. The Habitat Conservation Plan as it stands is unbalanced. A plan that does not negatively impact harvest levels, initially or in the long-term is absolutely necessary to keep the economic, environmental and social benefits in balance.

Submitted: Sun 09/20/2020 10:26 AM

Please take the next step towards implementing a Habitat Conservation Plan for the Tillamook and Clatsop State Forests by approving the development of an Environmental Impact Statement. This is an excellent proactive way of creating certainty for forest planners and harvesters and avoids shutdowns due to endangered species litigation. As someone who lives close to the Tillamook Forest I believe it is critical to adopt this plan for the health and welfare of all of us who live, work and play in our forests.

Beverly Stein
5510 5th St. NW, Tillamook, OR 97141
steinbeverly@gmail.com

Submitted: Thu 10/01/2020 2:28 PM

Greetings:

I am writing to urge a vote of yes to work on a draft Habitat Conservation Plan which will protect approximately 300,000 acres of state forest from industrial timber harvest.

The Western Oregon Forests Habitat Conservation Plan helps balance timber harvest with fish and wildlife habitat, recreation, and clean water. This long-term plan for habitat conservation in state forests would provide decent forest protections for six wild salmon and steelhead strongholds: the Wilson, Salmonberry, Nehalem, Miami, Trask, and Kilchis Rivers. It would also put 50 percent of the total forest in conservation for the next 70 years.

I also want to thank ODF for its work on this plan. I urge them to complete the work.

Sincerely,
Margaret Stephens
Salem, OR
mlstep@msn.com

Submitted: Tue 09/29/2020 9:30 PM

Hi, I moved to Nehalem a year ago. I live in a house off Foss Road, deep in the woods. I own the 1.2 acres I live on but am surrounded by a dense forest, hundreds of acres, owned by folks who might sell their land for logging. When I see clear cutting happening in our area I imagine the forest where I live. I imagine all of the precious creatures who are so happy here, their habitat destroyed, on a large scale. It is not just from living in the forest that makes me want to fight for Oregon's forest land, it is from believing that we have to take care of the things that take care of us. I support HCP 100%.

Ursula Rose Strauss
18650 Foss Road
ustrauss@gmail.com

Submitted: Fri 10/02/2020 8:41 PM

Dear Members of the Board of Forestry,

I want to first thank the staff of the ODF and partner organizations for the work they have put into drafting this HCP and communicating it with the public and stakeholders. An HCP for our state forests is clearly a step in the right direction. I am writing in support of moving forward with the next steps on this HCP because it secures the protection of precious habitat for endangered and threatened species. However I am concerned about the significant reduction in carbon stock projected in the comparative analysis between the current FMP and the HCP (p. XXX at <https://www.oregon.gov/odf/board/Documents/fmp-hcp/odf-ca-fin.pdf>). The Governor's Executive Order 20-04 directs state agencies to "consider and integrate climate change, climate change impacts [...] into their planning, budgets, investments and policy making decisions." I urge you to ask that the development of the companion FMP follow this directive and ensure that our forests are managed in a way that prioritizes carbon storage. Climate change is one of the biggest threats to many of the species listed in the HCP. We must take climate action if we want a healthy future for our human communities and our natural ecosystems.

Thank you for your service on the Board.

Sincerely,
Eugenia Tam, Ph. D.
Portland, OR
eug.tam@gmail.com

Submitted: Wed 09/30/2020 7:59 PM

Thank you for your work on the Habitat Conservation Plan. Please continue to provide significant, durable forest protections by advancing the plan for Clatsop and Tillamook State Forests. These forests support six wild salmon and steelhead populations and 16 imperiled species.

In a time of unprecedented species loss, this plan is more important than ever. Staff recommendation to "finalize the administrative draft of the HCP and move into the NEPA process" is the right way to proceed. An HCP gives lasting protection to endangered species and lets resources be managed in a manner that is consistent and predictable.

All Oregonians deserve to enjoy the benefit of public lands. The value that recreational users add to local economies are as important as resource extraction. Clean water and wildlife protection for future generations has an incalculable value.

Respectfully,

Jeanie Taylor
Yamhill County resident
jeanie@fastmail.com

Submitted: Tue 09/29/2020 11:38 AM

I am writing as a citizen of Oregon with an interest in protecting the Coast Range forest habitat IINCLUDING upland springs and marshes and watersheds draining to public water districts, serving both families and businesses as well as tourism.

I am supportive of the Habitat Conservation Plan. But it does not go far enough in my opinion. Private industrial forestry in the coastal headlands has destroyed the natural habitat, at best converting it to monoculture tree farms that get a haircut at only 40 years, just when the carbon storage of these cultivated plants begins to increase with further years of growth. We have become aware in the last 2 decades that Oregon's contribution to climate change in large part consists of carbon loss from denuding of forests both public and private, for financial managers to package into investments. Management decisions are corporate. They hire forestry graduates to carry out their business plans. This is a far cry from what has been known in the remote past as private forestry.

Ownership of land includes responsible stewardship of that land and that is not happening west of the Cascades. The Oregon Forest Practices Act, compared with those comparable laws in WA, CA and ID, are a bad joke.

We sold our home in Oceanside, because the source of "our" water was the Short Creek watershed owned by Stimson and Green Crow. I knew that this was going to share the fate of the Jetty Creek watershed serving Rockaway. The smoke from smoldering slash burns was a frequent reminder of what was to come.

So I would strongly support adding to the HCP these defined areas and watersheds serving communities whose payment of property taxes and public benefit from tourism so these could be protected once and for all.

Finally, it is finally becoming clear that the parasitic public agency calling itself the Oregon Forest Resources Institute supported by your and my tax dollars is breaking the law regularly by serving as a public policy advisor and de facto lobbyists on behalf of the Industrial forestry companies. My wife, attending a forestry-related meeting in Astoria several years ago was surrounded by three men who were asking her personal questions after she spoke out at that meeting. She was frightened by their intimidating behavior and later learned that they were part of the OFRI and that she was threatening to them.

David Prescott Thompson
Portland, OR
rosedalerocket@mac.com

Submitted: Tue 09/22/2020 8:29 PM

As a resident of a small coastal community in Tillamook County, I urge the Board of Forestry to ADOPT THE DRAFT HABITAT CONSERVATION PLAN at the meeting October 6, 2020, and to move forward with the Environmental Impact process. In my region, I enjoy the company of barred owls and their spotted owl cousins. I am amazed by the survival strategies of the marbled murrelet and shocked to think that permits might be considered to build on the steep cliffs and old growth stands where they still survive. I enjoy the occasional coho salmon my neighbors bring home. This draft HCP lays out an integrated plan to protect species and landscapes which make Tillamook and Clatsop Counties unique and productive for all citizens. Any vested interests who find this plan inconvenient are not looking at the whole picture, nor are they thinking about the long-term health of the land and water here that support farmers, breweries, fishermen, restaurants, health workers, and growing children who love finding a salamander in the yard.

Phyllis Thompson
PO Box 1091, Manzanita, OR, 97130
peatea0@yahoo.com

Submitted: Wed 09/16/2020 7:30 AM

Dear members of the Oregon Board of Forestry, I am a resident living on the coast in Tillamook County. I am pleading with you to please do everything in your power to protect the state's forests. I am asking that you please investigate whether the claims against a robust Habitat Conservation Plan are valid and true. Additionally, I am requesting that you connect to your own, innate moral compass within and weigh whether the minimal economic impact of protecting the forests is more important than the extensive benefits they provide to our mental, emotional, physical and spiritual wellbeing. The trees, animals and plants have innate worth and value. Please protect them now and for years to come.

Sincerely,
Sara Todd
sstodd@gmail.com

Submitted: Sun 09/27/2020 9:56 AM

I am a Tillamook County resident concerned about the health & future of our coastal forest lands. I am writing today in support of the Habitat Conservation Plan, which is long overdue. I am appalled at the intensive cutting of the coast range forests and the negative impact this ramped up logging has had on our water quality, negatively impacting fish and wildlife habitat and human health and well-being. As a coastal resident dependent I implore the board to please take action SOON to put the Habitat Conservation Plan in place and into action.

Respectfully Submitted,
Susan Tone
Nehalem Resident
11165 Seamont way
susantone@nehalem.tel.net
503.354.4072

Submitted: Fri 10/02/2020 5:33 PM

Dear Board,

I live on the mid-Oregon coast near Newport. I know what bad private land logging looks like (Siletz River steep slope logging and erosion to the bedrock). We can do much better than current state lands logging practices. I urge you to include a Habitat Conservation Plan in your strategic plan.

I have worked at wild salmon and steelhead advocacy for forty years. In terms of population abundance and viability over time, the wild salmon bar drops lower and lower over time, and our hopes and expectations with it. A Habitat Conservation Plan, if enforced, seems like at least a ground floor moral choice if we wish to have wild salmon populations in the future. I need even a small salmon-friendly victory to cheer about. Please adopt the Habitat Conservation Plan.

Respectfully,

Peter J. Tronquet
5730 SW Barnacle Court
South Beach, Oregon 97366
541-261-5041
pjtronquet@aol.com

Submitted: Thu 10/01/2020 4:32 PM

Dear Board Members:

I am writing today to ask the Oregon Board of Forestry to advance the Western Oregon Forests Habitat Conservation Plan on October 6 as recommended by Department Staff; that is, in a manner that will finalize the administrative draft and move it into the NEPA process.

As always, I am very concerned about maintaining durable habitat for the region's many keystone, iconic, and indicator wildlife species.

But as more and more everyday people now know, we are facing an array of evolving environmental challenges and their long-term, often unpredictable ramifications: climate disruption; shifting hydrology and threats to clean water; sustainable timber harvest; future fire management protocols; and the ever-greater fragmentation of land ownership and agency jurisdiction.

The draft HCP as recommended is the best way forward for establishing in Oregon a cost-effective, integrated, multiple-value approach to healthy forest ecology.

We owe the forest and future generations of Oregonians nothing less in the way of holistic consideration and policy applications. I thank ODF Staff for all the hard work invested in this project and thus urge the Board to see through that effort by advancing the HCP.

Respectfully,
Lloyd Vivola
12120 SE Foster Place
Portland, Oregon 97266
nouveladam@hotmail.com

Submitted: Fri 10/02/2020 11:47 AM

Dear Board Member Board of Forestry,

I urge you to support a balanced management plan for our state forests. Oregon has been a pioneer with our Oregon Salmon Plan and our Oregon Forest Practice laws and we need to be proud of how we do things here-not fall victim to wanting to be the trendy kid who restricts logging so that we can say we did! We can think for ourselves and do better than just heeding to the cry of our extremely political environmental lobby. We must manage our state's forests for the future which means balanced management including harvest! Our kids need you to be leaders who will manage our forests sustainability, not just allow the trees to rot and be fuel for fires. It is also wise to use these forests to help provide education funding and jobs. The funding for schools has to come from somewhere and this is a win/win for our state's future. Be bold! Be strong! Be leaders! Do the right thing and do not wimp-out on this and give-in to the pressure of the big money environmental lobby. My kids are depending on you.

I appreciate your help,
Jennifer Waggoner
87575 Portage Way
Florence, OR 97439
Jennifer.Waggoner.372749611@p2a.co

Submitted: Tue 09/29/2020 10:33 AM

It doesn't take science. Just a simple observation over a fairly short period of time by folks who live here. It shows that there is a significant increase of silt entering into the Nehalem river and bay. And clear cut logging on our west slopes, with residual chemical spraying has not only added to the silt in our bay and river, but degraded the quality of our drinking water in our small communities. We don't need scientists to tell us. We can see and are experiencing the results of private and state sponsored interests in maximizing short term timber exploitation. These results are impacting and degrading the quality of life not only for the local residents but for all of the wildlife that rely on the long term diversity of forest lands to survive. If allowed to continue along this path, our children and grand children will be the ones to deal with an environment that cannot sustain a decent quality of life. No amount of tourist revenue will help us as we continue to degrade the very pristine coastal environment that they come to enjoy. As you consider creating a Habitat Conservation Plan for Tillamook and Clatsop Counties, I urge you to go forward with this plan. And I suggest that the Plan include a common sense moratorium on clear cut logging on the west slopes of the entire coastal range so we can begin to repair the forests and sustain the quality of our water, soil and precious and fragile coastal environment.

Submitted: Wed 09/16/2020 8:14 AM

To Whom It May Concern,

It doesn't take science. Just a simple observation over a fairly short period of time by folks who live here. It shows that there is a significant increase of silt entering into the Nehalem river and bay. And clear cut logging on our west slopes, with residual chemical spraying has not only added to the silt in our bay and river, but degraded the quality of our drinking water in our small communities.

We don't need scientists to tell us. We can see and are experiencing the results of private and state sponsored interests in maximizing short term timber exploitation. These results are impacting and degrading the quality of life not only for the local residents but for all of the wildlife that rely on the long term diversity of forest lands to survive. If allowed to continue along this path, our children and grand children will be the ones to deal with an environment that cannot sustain a decent quality of life. No amount of tourist revenue will help us as we continue to degrade the very pristine coastal environment that they come to enjoy.

As you consider creating a Habitat Conservation Plan for Tillamook and Clatsop Counties, I urge you to go forward with this plan. And I suggest that the Plan include a common sense moratorium on clear cut logging on the west slopes of the entire coastal range so we can begin to repair the forests and sustain the quality of our water, soil and precious and fragile coastal environment.

Thank you.

Susan Walsh, PO Box 223, scwalsh@nehalemtel.net

Submitted: Wed 09/30/2020 12:49 PM

We need to drastically change our FORESTRY PRACTICES in OREGON to protect OUR ENVIRONMENT! Current harvests are contributing to the GLOBAL CLIMATE CRISIS because they are cutting down Christmas Tree sized Lumber to satisfy WALL STREET because "SUSTAINED YIELD IS A MYTH! If it wasn't there would be NEW OLD GROWTH TO HARVEST which is much less CARBON INTENSIVE FOR OUR ENVIRONMENT. ALSO! Compared to our neighbor states we are getting screwed out of 130 MILLION DOLLARS IN REVENUE AND TAXES EVERY YEAR while they AUTOMATE AND SHIP JOBS TO ASIA! So we need DRASTIC CHANGE BECAUSE THE JOBS ARE gone! We can SAVE OUR HABITAT!

Christopher P Warren
37099 Wallace Creek Rd, Springfield, OR
oneworldatpeace@comcast.net

Submitted: Thu 09/03/2020 10:32 AM

To: Governor Kate Brown; copied: Tom Imeson, Chair, Board of Forestry

I am alarmed by the poor stewardship of state forests by your Board of Forestry. Recent news coverage clearly demonstrated unsustainable harvests, bogus conservation areas, and suppression of board members who raise conservation or financial issues.

I ask to you put a sharp focus on cleaning up this mess. Obviously the Board and Department need new leadership that proceeds with transparency and integrity. Forest conservation for fish, wildlife, recreation, water supply, and carbon storage need to be put on an equal footing with timber harvest.

Like your leadership on the Elliott, we need you to help decouple state forest from government budgets and to finish a Habitat Conservation Plan that increases conservation and gives security to both habitat and harvest outcomes.

We understand that this is a complex problem that will take time to solve, but right now your appointees are leading strongly in the wrong direction.

Sincerely,
Travis Wilhoite
21665 Willamette Dr.
West Linn, OR 97068
travis.wilhoite@gmail.com

Submitted: Tue 09/29/2020 7:24 PM

Hello- I'm writing as a North Coast citizen to support the upcoming proposed HCP. I believe this plan will be the the benefit of all Oregonians for the following reasons: -Conserves necessary land for endangered species without the cost of constant surveys. -Conserves land for Oregon's growing recreational forest usage. -Saves money on lawsuits related to endanger species in proposed or current logging areas. -Possibly, hopefully, protects more land that is part of watershed areas to keep our drinking water free from pesticide contamination (please!) -Allows for sufficient logging activity to be fiscally sound. This plan addresses endangered species concerns, provides more stability and certainty for everyone using our forests, appeases many conservation organizations, and preserves and continues to support the private logging industry that also makes use of our forests and employs many of our local residents, making the greatest permanent value for our forests to our citizens. Thank you for your time and consideration!

Alyssa Woods
507 Laneda Ave. #1 Manzanita, OR 97130
alyssadwoods@gmail.com

Submitted: Fri 10/02/2020 8:12 PM

Though this is late on the deadline day, I hope it is not too late to urge you to move ahead with the State Forest Habitat Conservation plan for western Oregon for both practical and ecological reasons. Having an actual plan will reduce the state's liability in endangered species lawsuits, freeing up resources for conservation and wildlife management programs. Though more analysis will come in the NEPA process, the plan places value on significant wildlife protection, clean water and climate mitigation while considering the interests of recreation and timber harvest. There is definitely enough current information for the board to move forward. Please vote to continue the planning process.

Sincerely,

Kathleen Worley

Volunteer with Trail Keepers of Oregon, Pacific Crest Trail Assoc. and Great Old Broads for Wilderness

worleyk@reed.edu

Submitted: Mon 09/21/2020 9:22 PM

To whom it may concern,

I'm writing as a fishing guide who lives in the Rogue Valley and fishes, guides and recreates on the Rogue and South Umpqua rivers.

Especially on the South fork Umpqua and Rogue, I have observed over the last decade of guiding how the current limited stream buffers in place between active logging zones and waterways are insufficient to prevent notable runoff into the river during rain events. It's especially noticeable on steep slopes where the buffer appears to be the same as on lesser gradient logging jobs. The erosion muddies the rivers, their levels swell and flash faster than they should, and then clear slower as well. It makes for a shorter window of fishable conditions for anglers, but also degrades the habitat quality for the fish during these changing conditions. Also of note, the barrier is only wide enough to allow for 1-3 trees to grow. I just can't see how that little strip of vegetation is enough to dampen the effects of logging erosion. Additionally, these few trees do not provide much shade for the river in summer - a critical component of keeping in stream water temps down for Salmonids in the river.

The South Umpqua used to support spring salmon and summer steelhead - but the lack of shade and over logging which caused insane amounts of erosion and gravel loss are a shame. But acting now to increase buffers can help the species still there like winter steelhead, coho and chinook do better.

Please consider increasing the buffer zone to allow for a few more trees between the river and the logging zone for the overall health of the river and to increase the function of the riparian zone.

Thanks for your consideration,
Brandon Worthington

--

Brandon Worthington
760-424-9682
Worthingtonflyfishing@gmail.com

Exceptional guiding, outstanding days on the water
Plan your trip

Submitted: Fri 10/02/2020 12:19 AM

To the Oregon Board of Forestry,

Please advance the Habitat Conservation Plan at your next meeting on October 6.

We are not Oregon without our forests. It is time the logging industry really learn a radical way to be stewards of our forests across the entire state.

Kerrie B Wrye
ftsfamily@gmail.com

Submitted: Wed 09/30/2020 11:05 PM

Dear Oregon Board of Forestry,

I am writing to urge you to support and finalize the draft of the HCP. More than ever, with forests burning and species on the brink of extinction, we must move to support long term habitat protections for Oregon's imperiled salmon, steelhead, murrelets and Spotted Owls. With a HCP, we will be able to embrace the values of a healthy ecosystem, recreation and sustainable harvests.

Thank you very much for your work on this plan. Please complete the work so it can move into the NEPA process.

Sincerely,
Jan Zuckerman

September 18, 2020

Oregon Dept. of Forestry
Peter Daugherty, State Forester
2600 State St.
Salem, OR. 97310

Re. Western Oregon HCP Steering Committee Statement of Support

Dear State Forester Daugherty:

The state and federal agencies below have been engaging with the Oregon Department of Forestry since late 2018 as part of a Steering Committee convened to assist in the development of a draft Western Oregon Habitat Conservation Plan (HCP) and related Incidental Take Permit. The Steering Committee has provided director-level feedback and guidance to agency staff working with ODF and technical contractors as part of a Scoping Team working collaboratively on draft HCP work products.

As a Steering Committee, we wish to express this collective Statement of Support for the Oregon Board of Forestry's continued advancement of the Western Oregon HCP. We understand additional work and details remain prior to ODF's submission of a final administrative draft HCP to the federal Endangered Species Act regulatory agencies for review under the National Environmental Policy Act. That said, we are committed to continued collaborative work with one another and ODF, and we believe the work completed to date is valuable and worth the Board of Forestry's support in moving to the next phase.

We have confidence in the robust process to date and related structures such as the Steering Committee and Scoping Team. We also appreciate the engagement efforts this process has fostered outside of these two venues with county governments, stakeholders, and the broader public. Should the Board advance the current draft HCP effort into the federal NEPA process, we will continue to work collaboratively to ensure the final administrative draft addresses any remaining technical, legal, or policy issues needed to complete this final pre-NEPA step. Further, as part of any future NEPA process, we will commit our resources to advancing the proposed HCP and related Incidental Take Permit through competition of that process.

We also stand ready to respond to any questions you may have.

Sincerely,

Members of the Western Oregon HCP Steering Committee:

- *Oregon Department of Environmental Quality, Leah Feldon*
- *Oregon Department of Fish & Wildlife, Doug Cottam*
- *Oregon Department of State Lands, Bill Ryan*
- *Oregon State University, Dan Edge*
- *NOAA Fisheries, Kim Kratz*
- *U.S. Fish and Wildlife Service, Paul Henson*