



Board of Forestry

Western Oregon

State Forests HCP Information

November 16th, 2022

Michael Wilson, State Forests Division Chief

Nick Palazzotto, Resource Support Unit Manager

Cindy Kolomechuk, HCP Project Manager

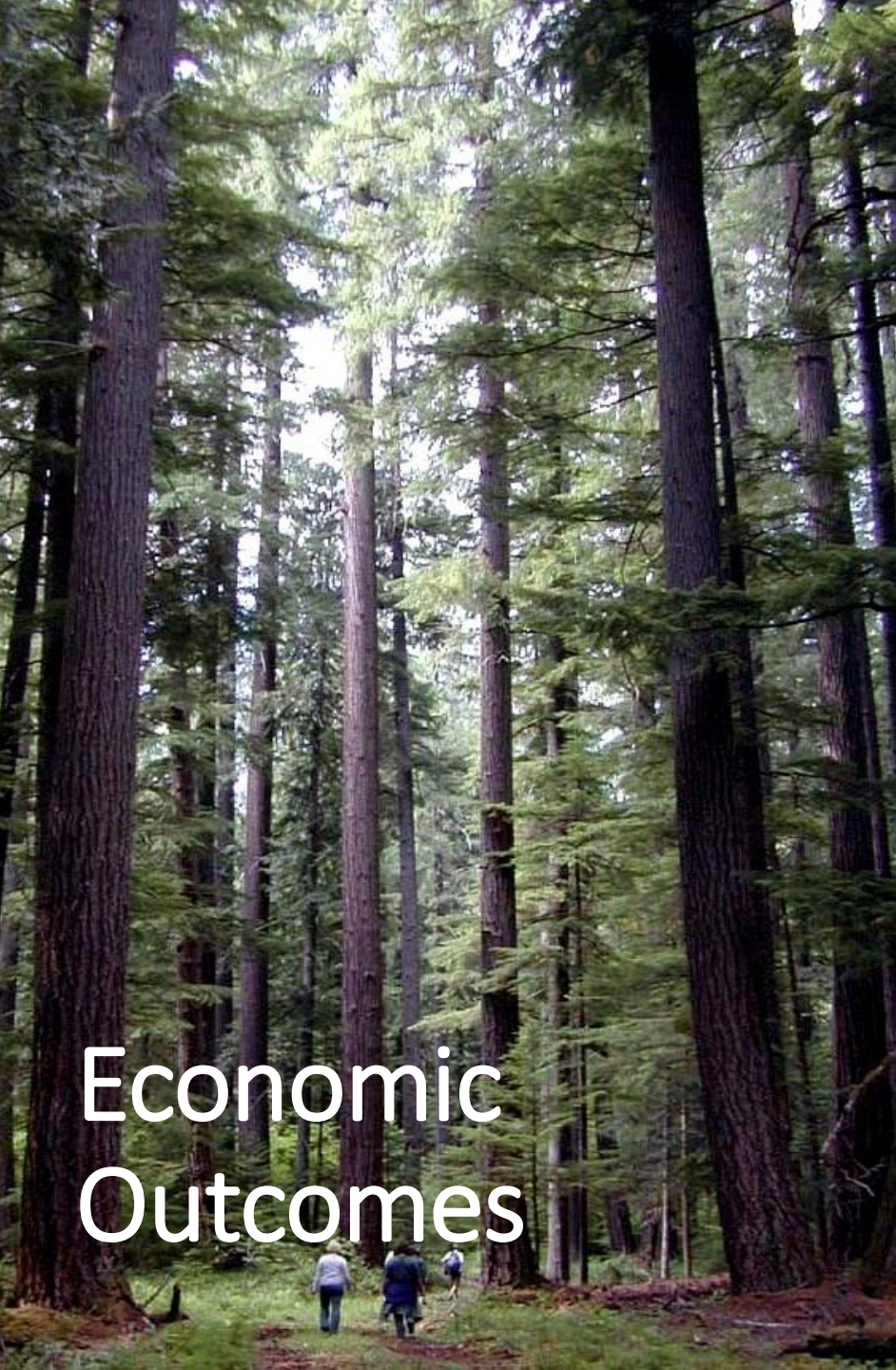


- Background & Context
- Economic Outcomes
- Environmental Outcomes
- Risk to Species and HCP Process



Background & Context

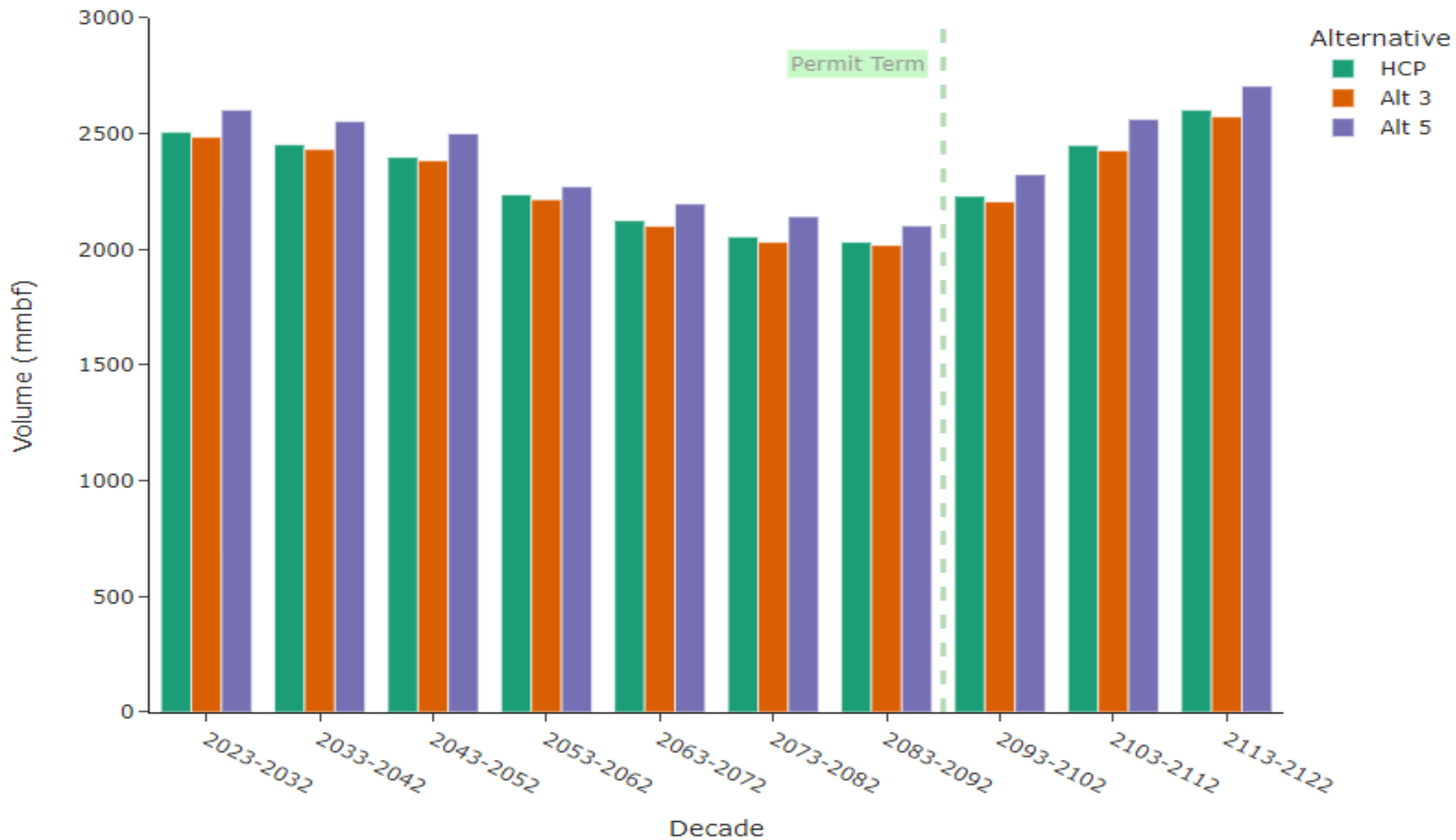
- Relative Comparison
- Evaluates costs and benefits: HCP and DEIS Alternatives 3 & 5
- Division supports the HCP as the Proposed Action to provide certainty:
 - 4 years of collaborative work
 - Likelihood of meeting ITP Issuance Criteria
 - Management certainty over 70 years
 - DEIS Alternatives do not drastically increase economic or conservation outcomes
 - Increased time and risk associated with changes to the Proposed Action (HCP)



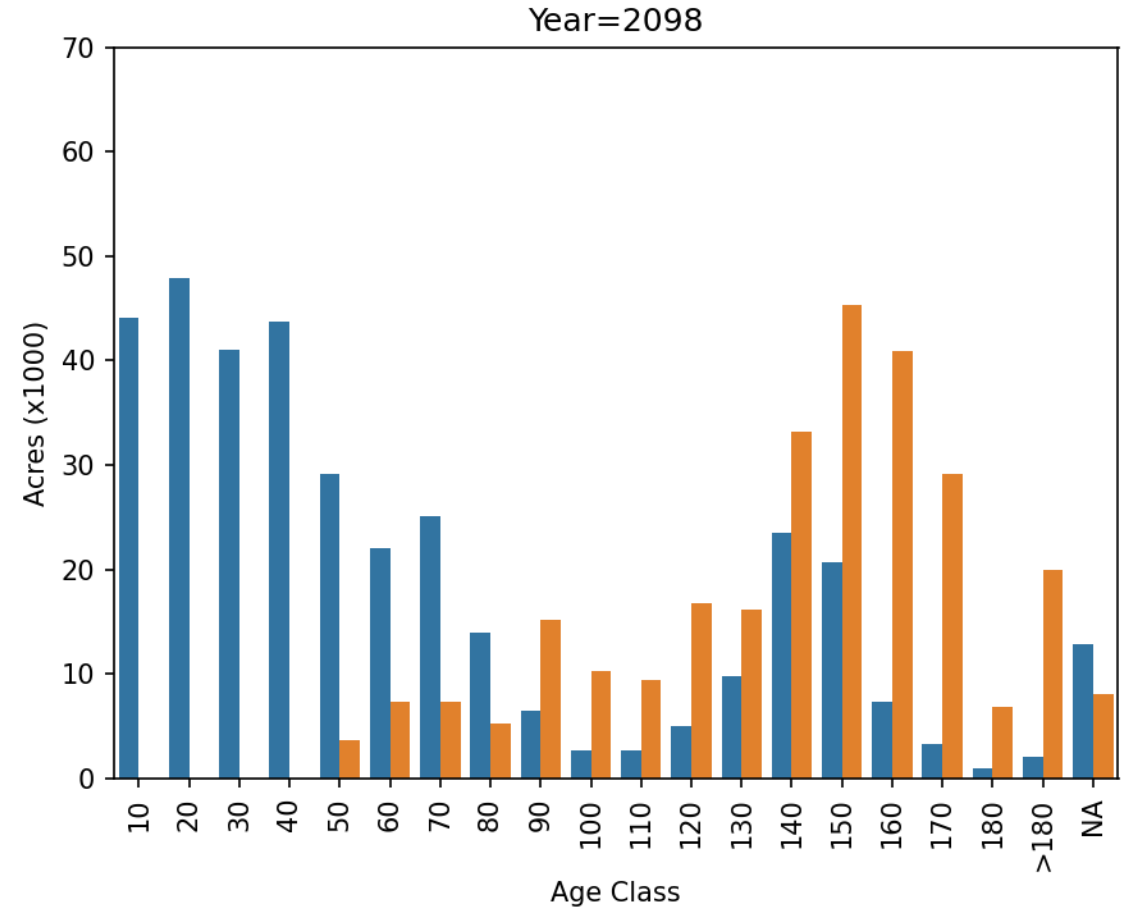
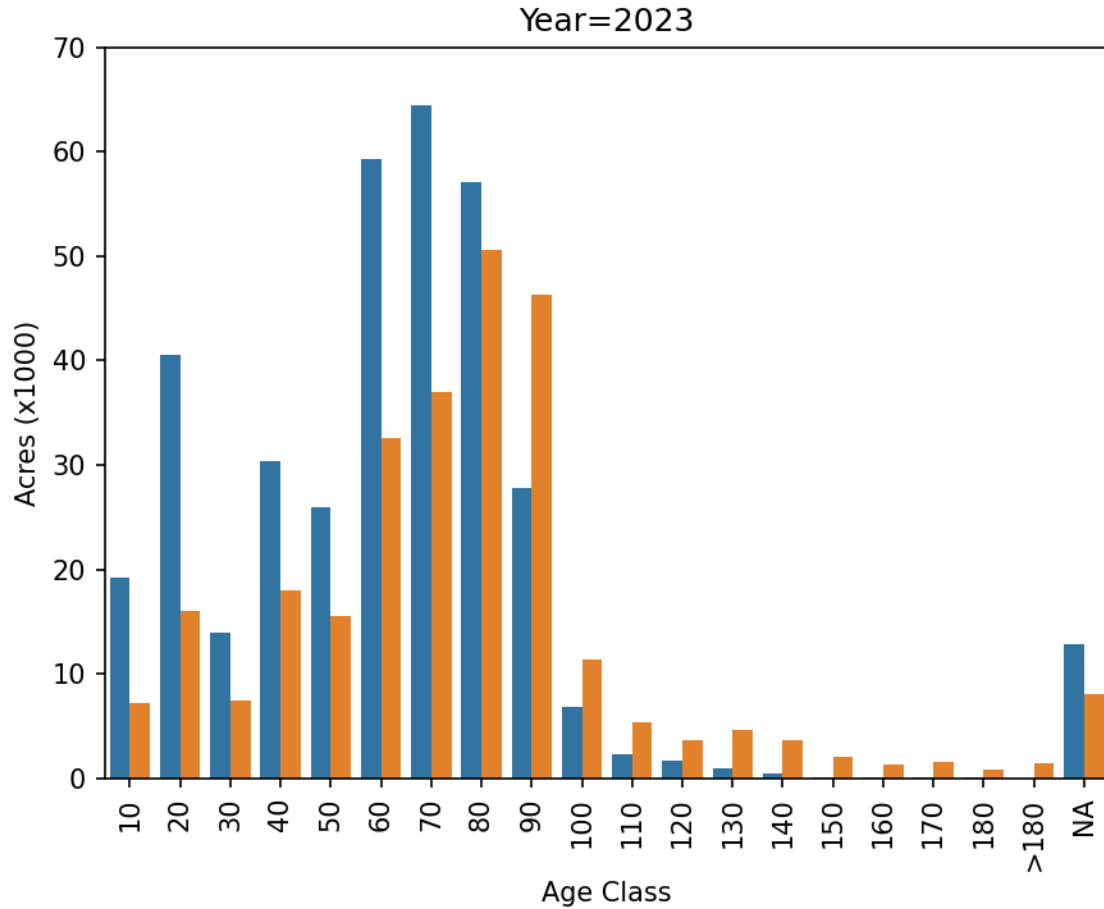
Economic Outcomes

- Harvest Volume Levels
- Net Present Value
- Cash Flow Analysis
- State Forests Contributions to Gross Domestic Product

Decadal Harvest

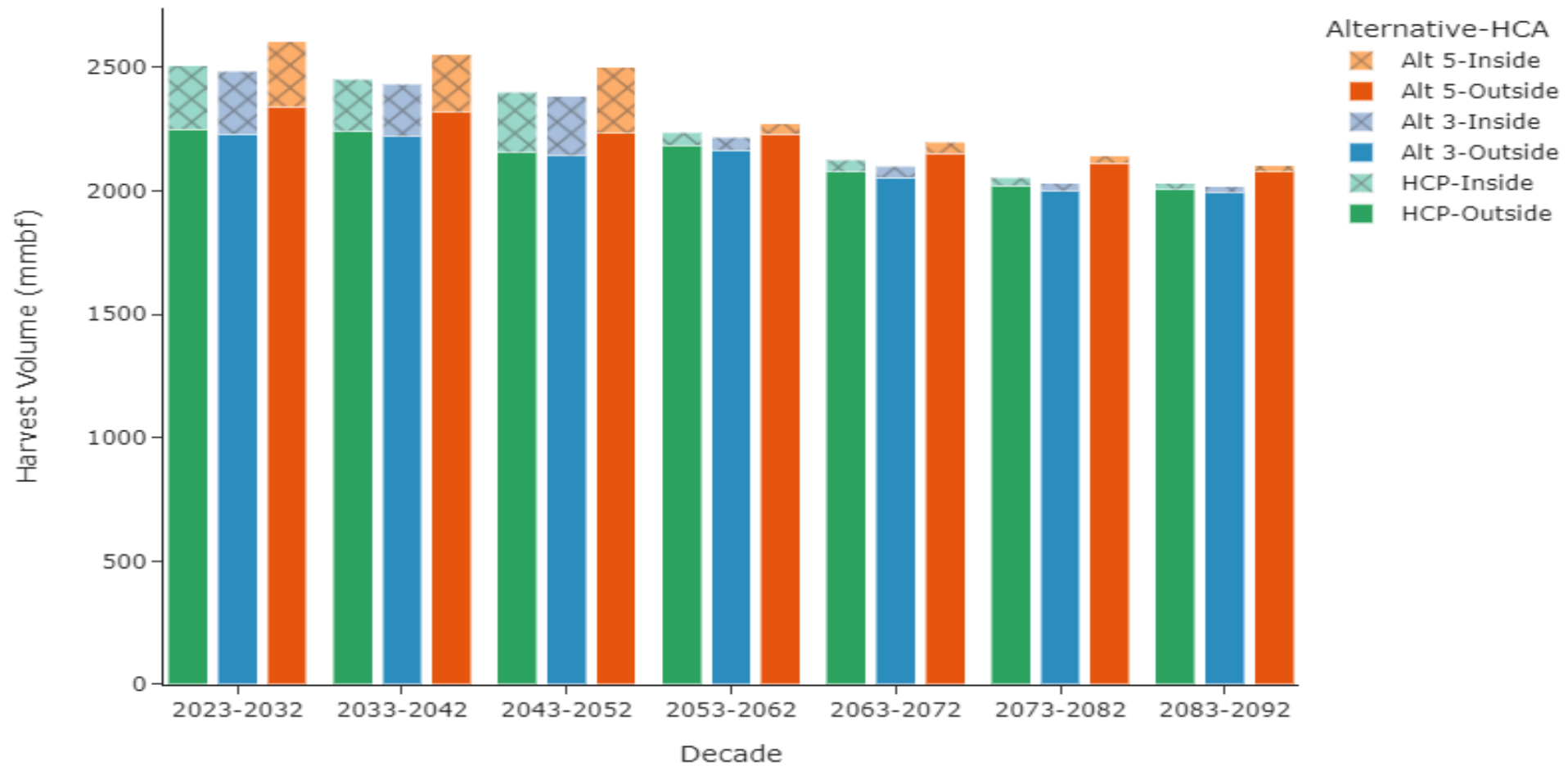


HCP Age Class Transitions

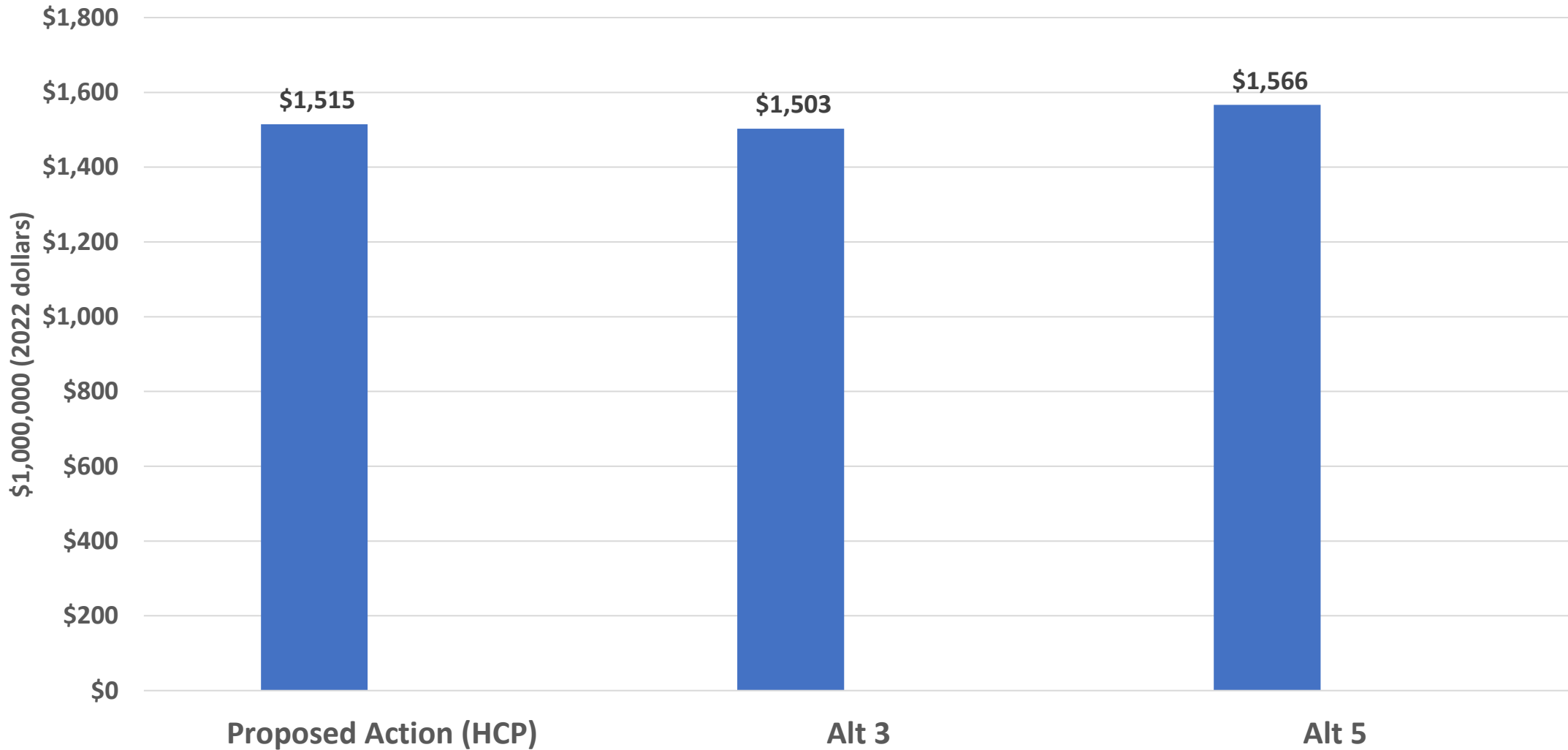


Harvest - HCA

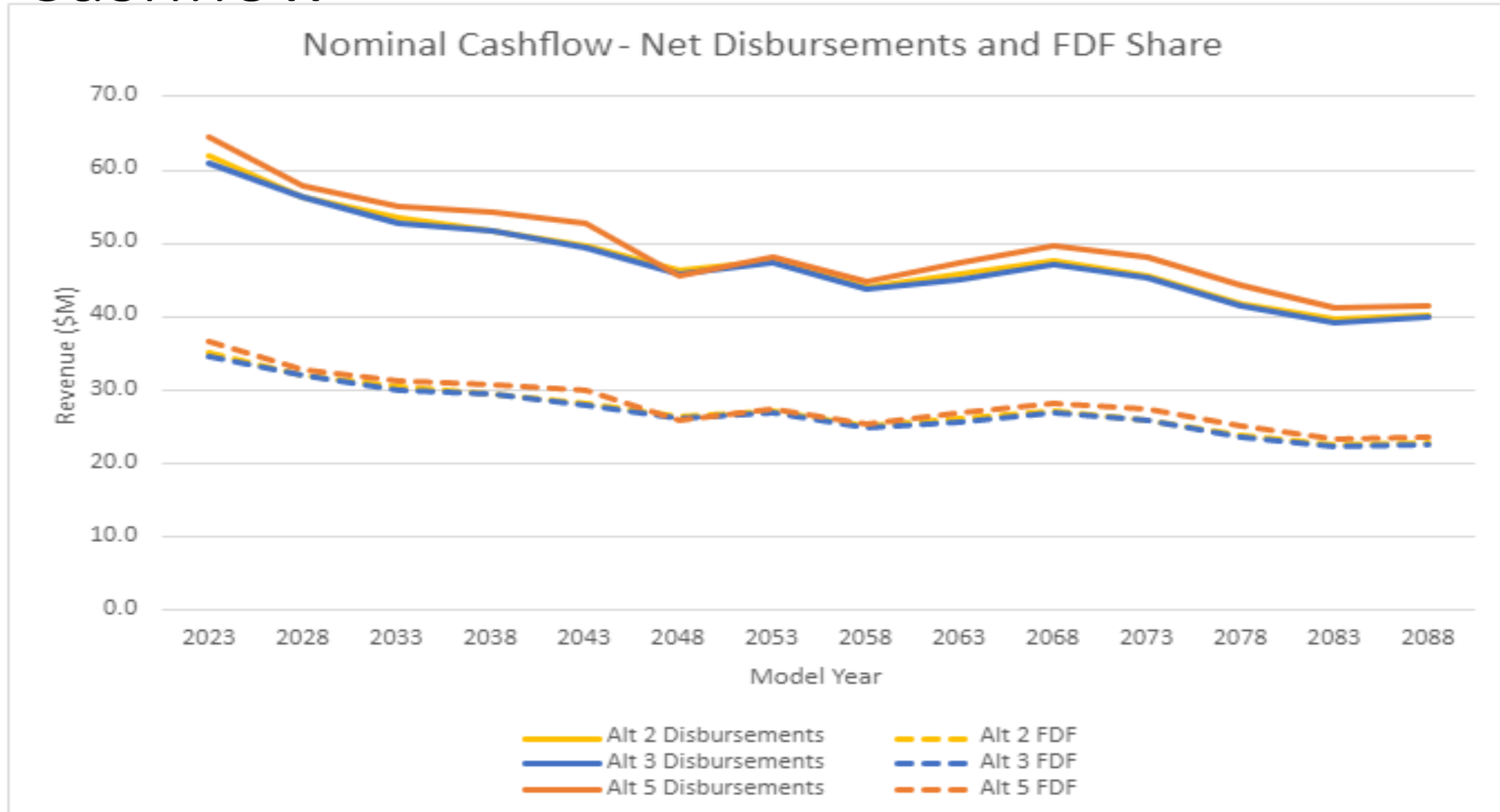
Decadal Harvest Volume



Cumulative Net Present Value



Cashflow



State Forests Proportion of Harvest

Percent of Total Harvest (2013-2020)

- Tillamook – 44%
- Clatsop – 33%
- Washington – 29%
- All others are less than 10%



Regional
State Forests
Revenue
Contributions



Environmental

- Risk to Species Across Alternatives
 - Conservation Value Comparison
- HCA Development Process
- Application of Alt 3
- Water Yield & Timing
- Durability of RCAs
- Risk to species from disturbance
- Proposed Action Modification
 - Implications & Risk

Habitat Outcomes: Increased RCAs (Alt. 3)

Species	Inside HCAs (acres)	Total Habitat (acres)		
		No Change	HCP	Alt. 3
Spotted Owl	249,000	340,000	343,000	1
Marbled Murrelet	210,000	275,000	280,000	2
Red Tree Vole	196,000	260,000	262,000	1

- No effect on habitat inside HCAs.
- Increase modeled habitat outside HCAs.
 - Limited to upslope areas within harvest units.
 - Minor uptick in connectivity.
 - Lower take of Oregon slender salamanders and red tree voles.

Habitat Outcomes: Reduced HCAs (Alt. 5)

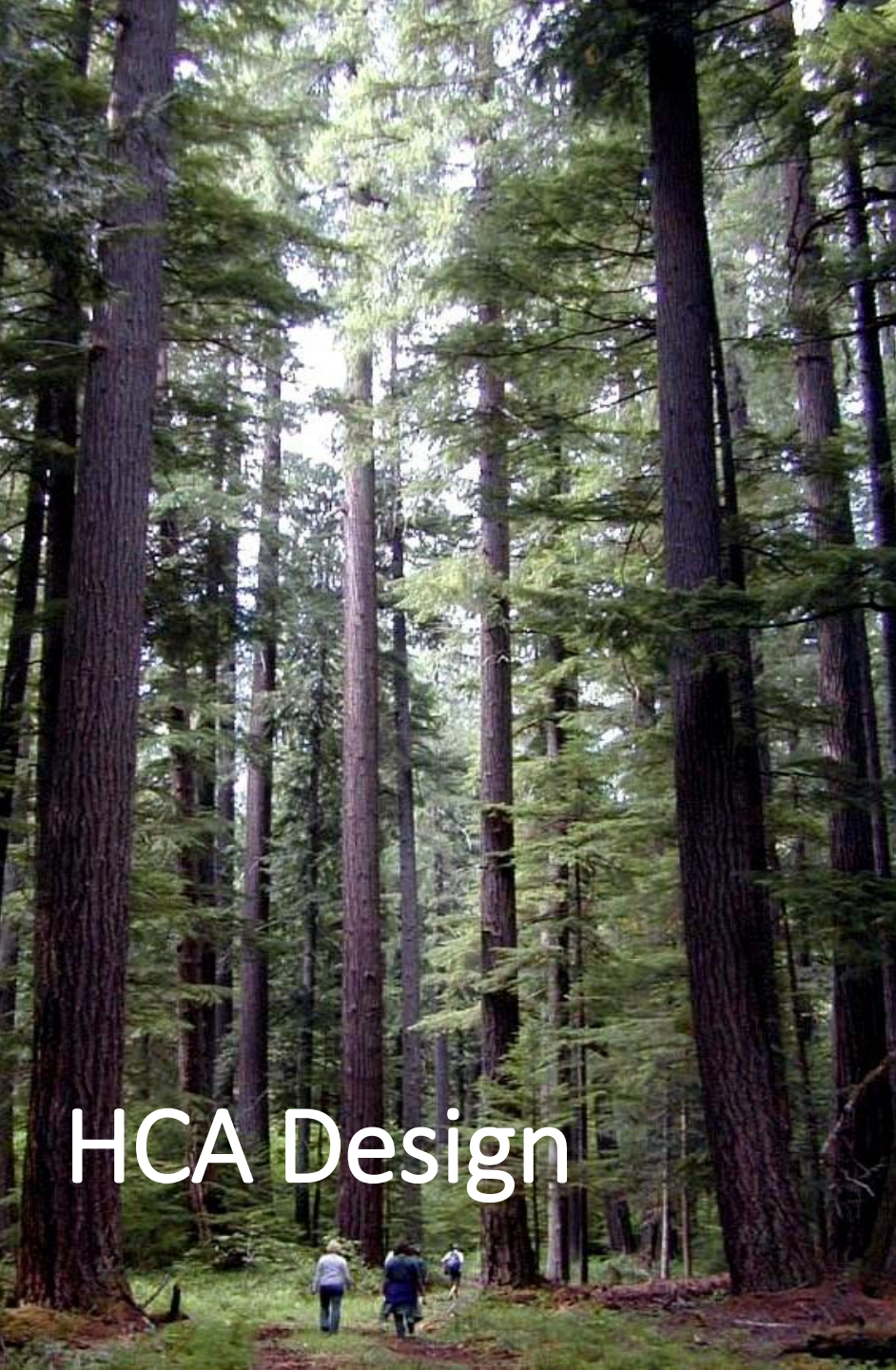
- 23,500 acres of timber production value removed.
- 8,000 acres of low production value added.
- Net reduction of 15,500 acres.
- Less modeled habitat inside
- More modeled habitat outside

Species	Habitat Inside HCAs (acres) - Start of Permit Term			
	HCP	Alternative 5	Net Decrease	% Decrease
Spotted Owl	123,000	114,000	9,000	7
Marbled Murrelet	47,000	43,000	4,000	9
Red Tree Vole	72,000	66,000	6,000	8
Species	Habitat Inside HCAs (acres) - End of Permit Term			
	HCP	Alternative 5	Net Decrease	% Decrease
Spotted Owl	249,000	232,000	17,000	7
Marbled Murrelet	210,000	193,000	17,000	8
Red Tree Vole	196,000	179,000	17,000	9



Relative Conservation Value

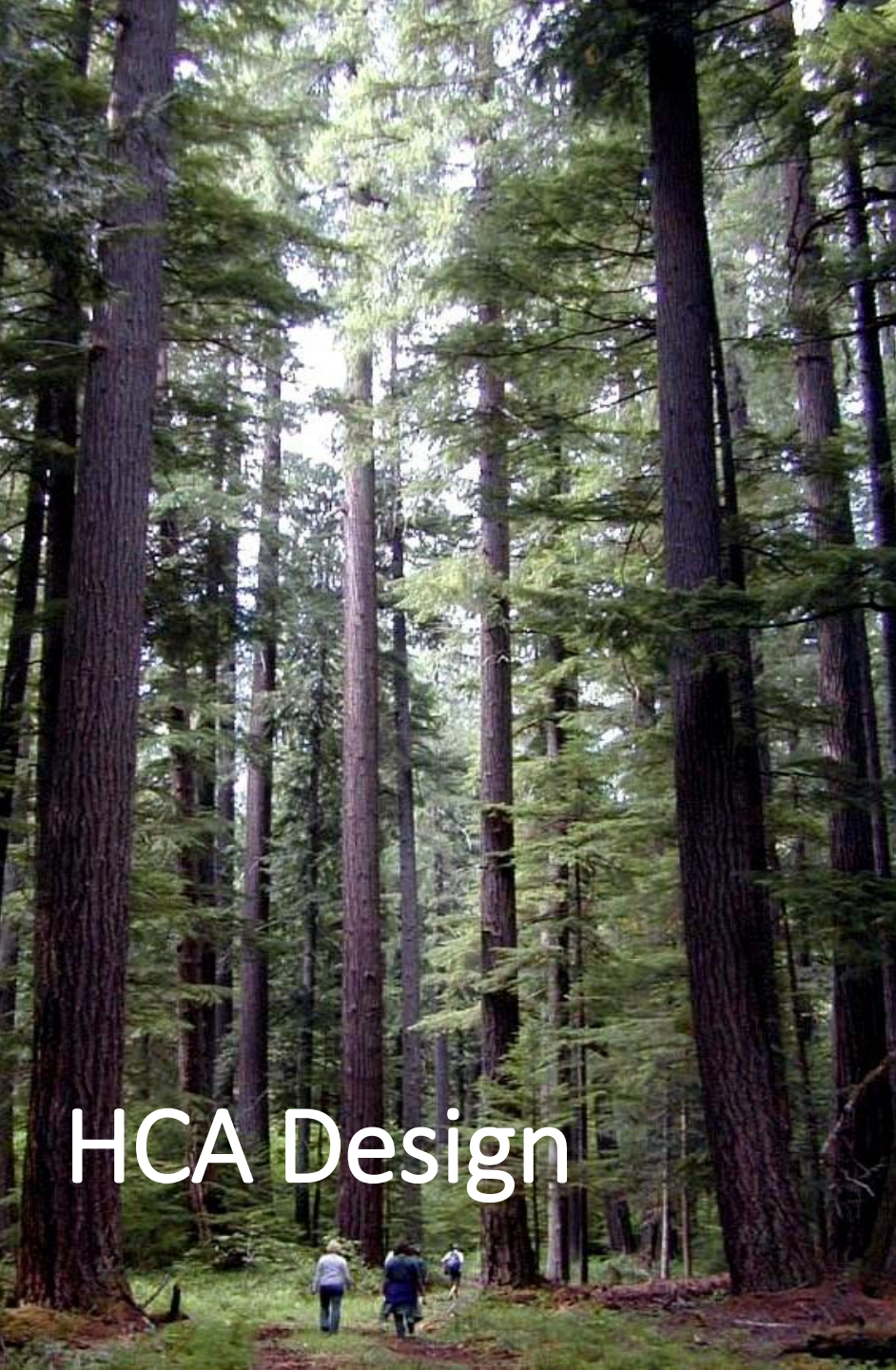
- Alternative 3 provides slightly higher value
 - More habitat, more connectivity
 - In harvest units
 - Outside HCAs
- Alternative 5 provides lower value
 - Reduced habitat in HCAs
 - Reduced landscape function
 - Short- and long-term effects



HCA Design

Biological Considerations

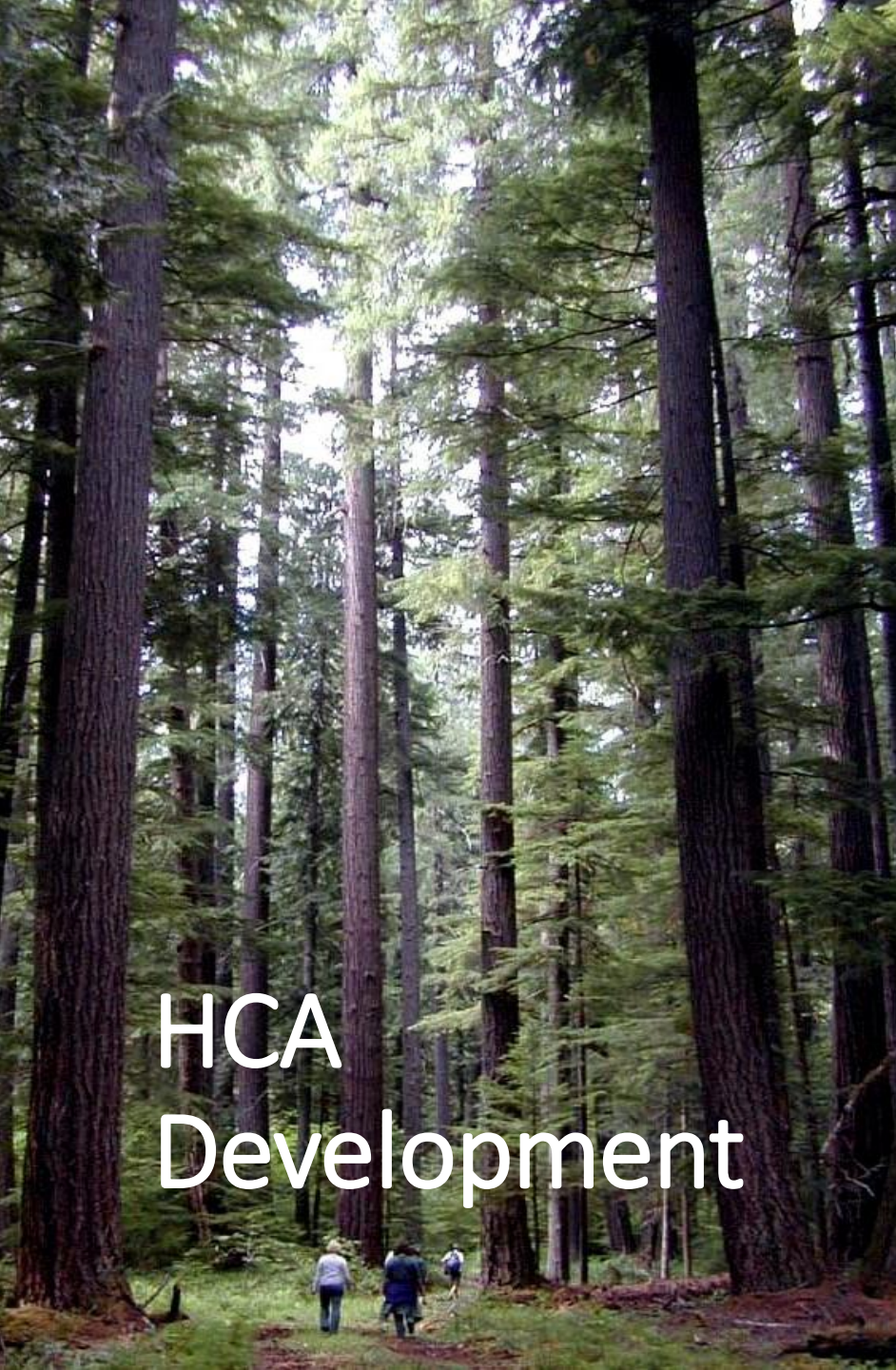
- Species occurrence – current and historic
- Habitat – current and projected
- Landscape function
 - Minimize edge
 - Maximize interior habitat area
 - Enhance connectivity
 - Well-distributed across districts and elevations
 - Resilient to disturbance



HCA Design

Operational Considerations

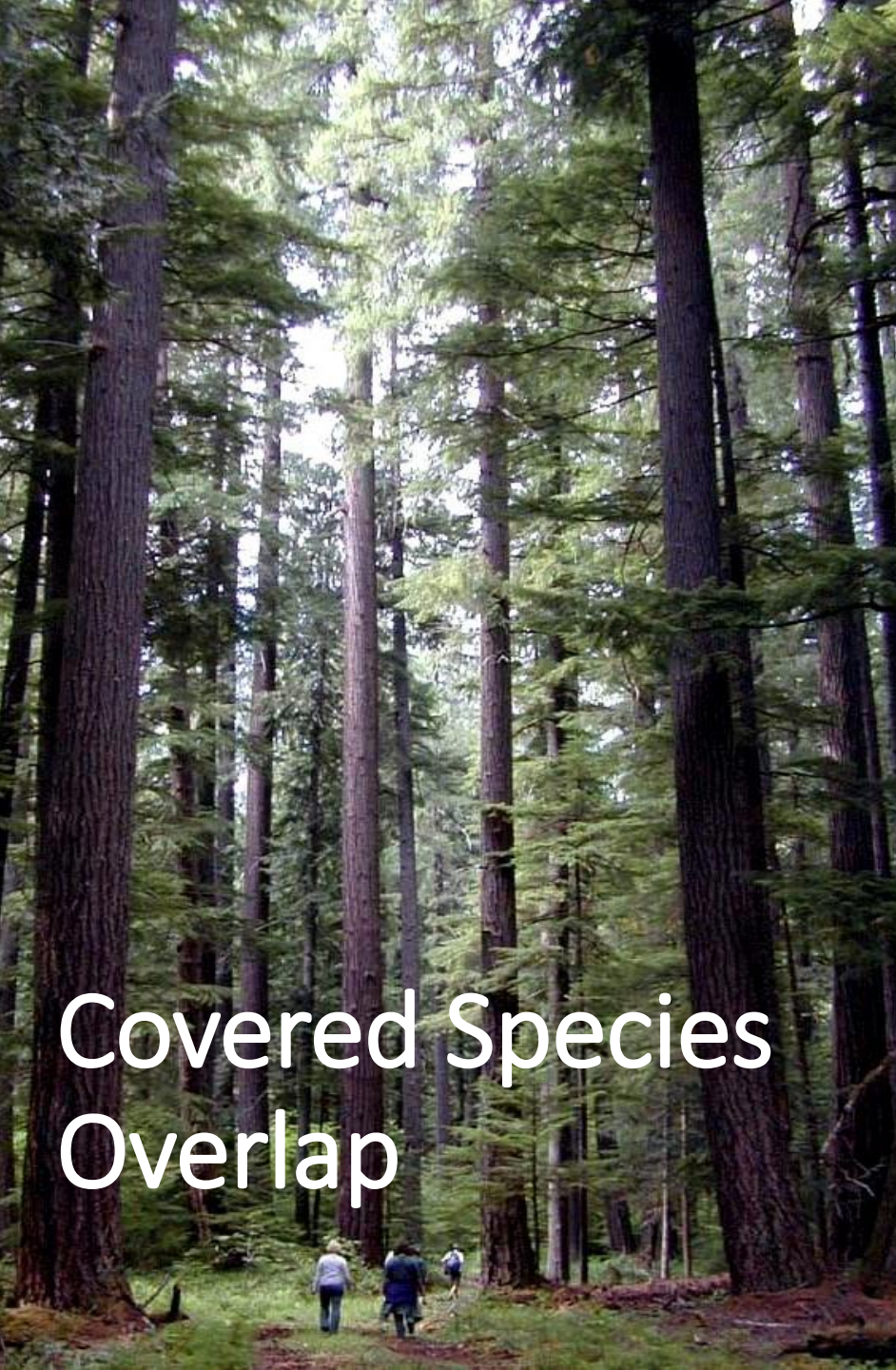
- Site class/Productivity
- Logging/Yarding methods
- Access/Haul routes
- Neighbors/Local issues
- Scenic considerations
- Domestic water sources
- Recreation
- Landslides and public safety
- Forest health
- Reforestation costs



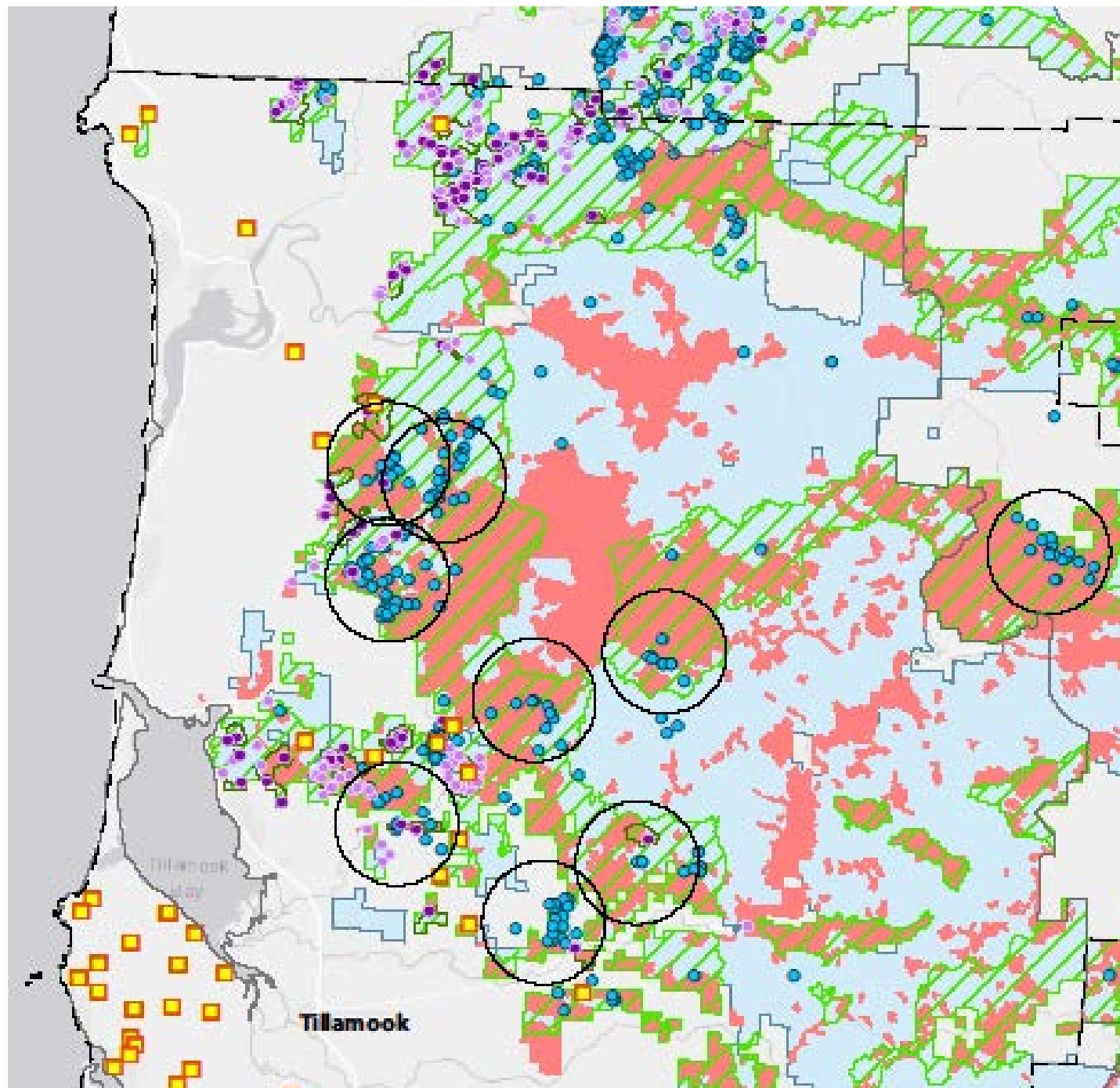
HCA Development

Development and Review Process (2020 – 2021):

- ODF biologist-led first draft
- Field review and suggestions
- Division Leadership review and revisions
- Scoping Team review and revisions
- Operational boundary adjustments
- Scoping Team review throughout



Covered Species Overlap



Acreege Breakdown: Inside HCAs

Land Allocation Category	Acres	% of Permit Area
Total Permit Area	634,549	100%
Total Inside HCAs	272,111	43%
RCA Inside HCAs	37,405	6%
Net Upland HCAs	234,706	37%
Inoperable Inside HCAs	53,899	8%
Existing NSO and MAMU sites	54,705	9%
Managed Inside HCAs	75,000	12%
Remaining Unmanaged Inside HCAs	51,102	8%

Acreage Breakdown: Outside HCAs

Land Allocation Category	Acres	% of Permit Area
Total Permit Area	634,549	100%
Total Outside HCAs	362,437	57%
RCAs Outside HCAs	42,568	7%
Additional Inoperable Outside HCAs	20,796	3%
Available Operable	299,073	47%

Swiss Needle Cast and Hardwood Stands in HCAs

SNC and hardwood-dominated stands included for biological function:

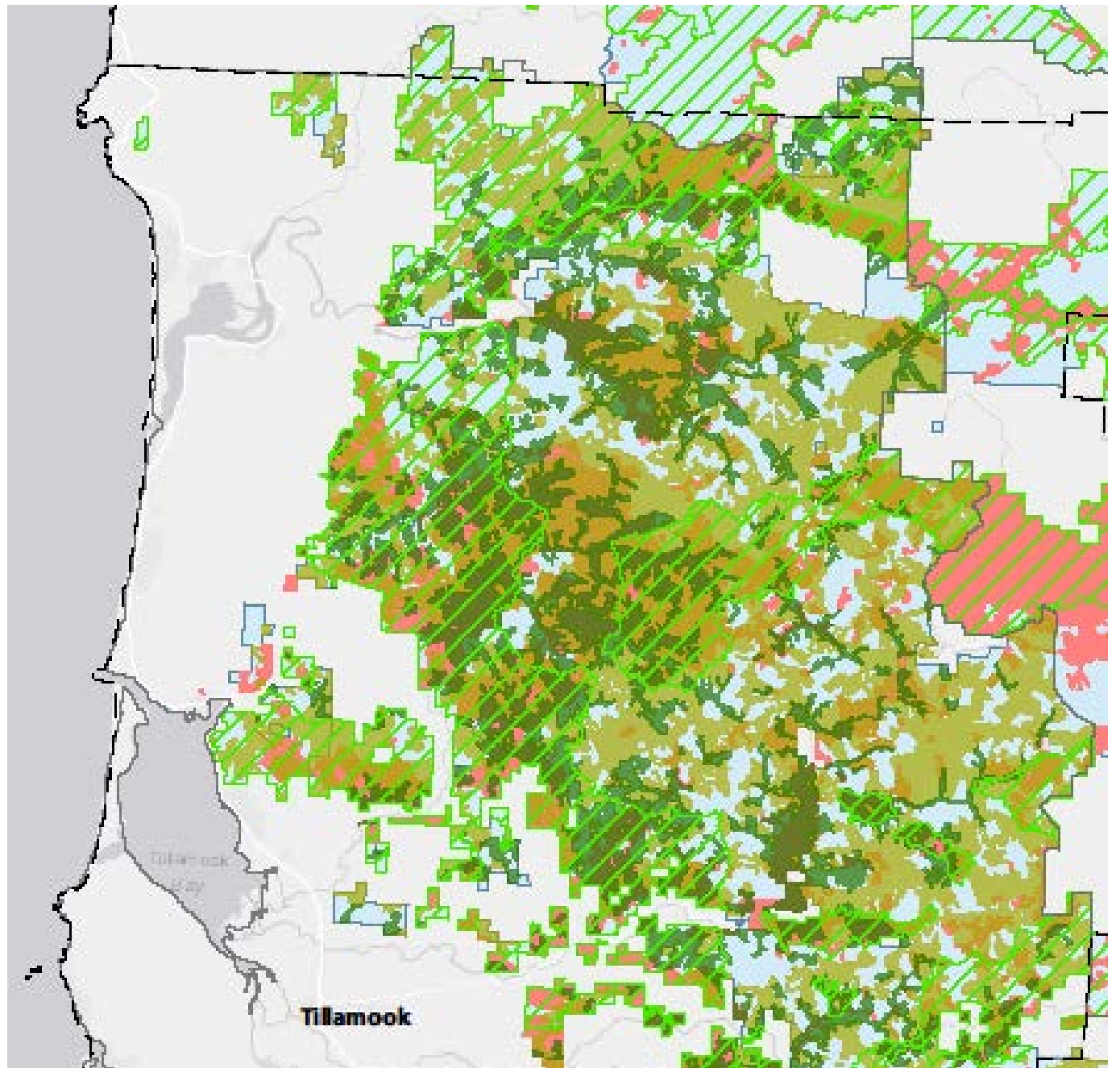
- Occurrence
- Habitat
- Landscape Function

- 24,000 acres SNC on operable ground
- 17,600 acres hardwood-dominant stands on operable ground

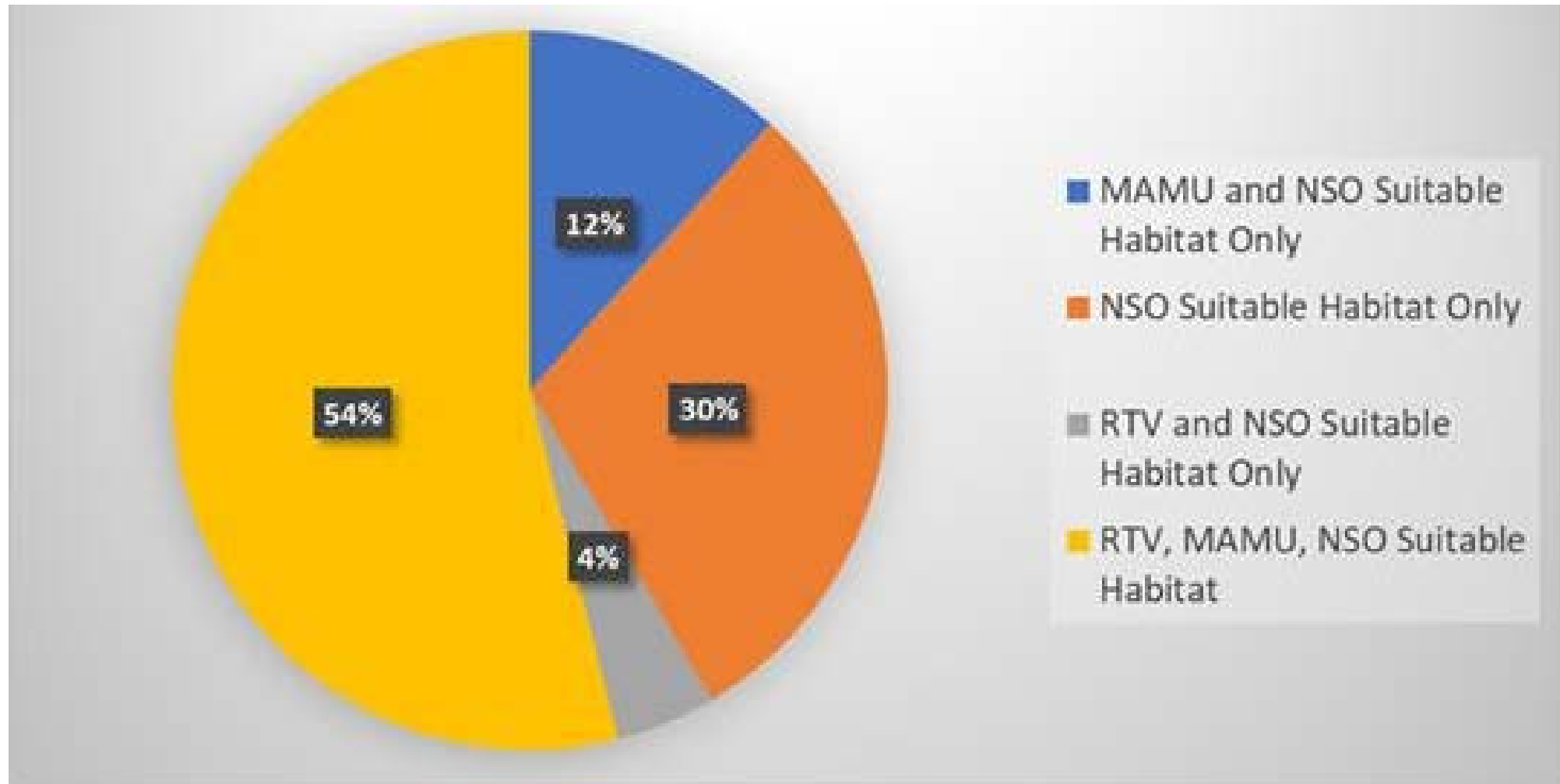
- Can manage up to 15,000 acres of each in first 30 years
- Unmanaged acres offer baseline habitat comparisons
- No ESA constraints outside of HCAs



Swiss Needle Cast and Hardwoods

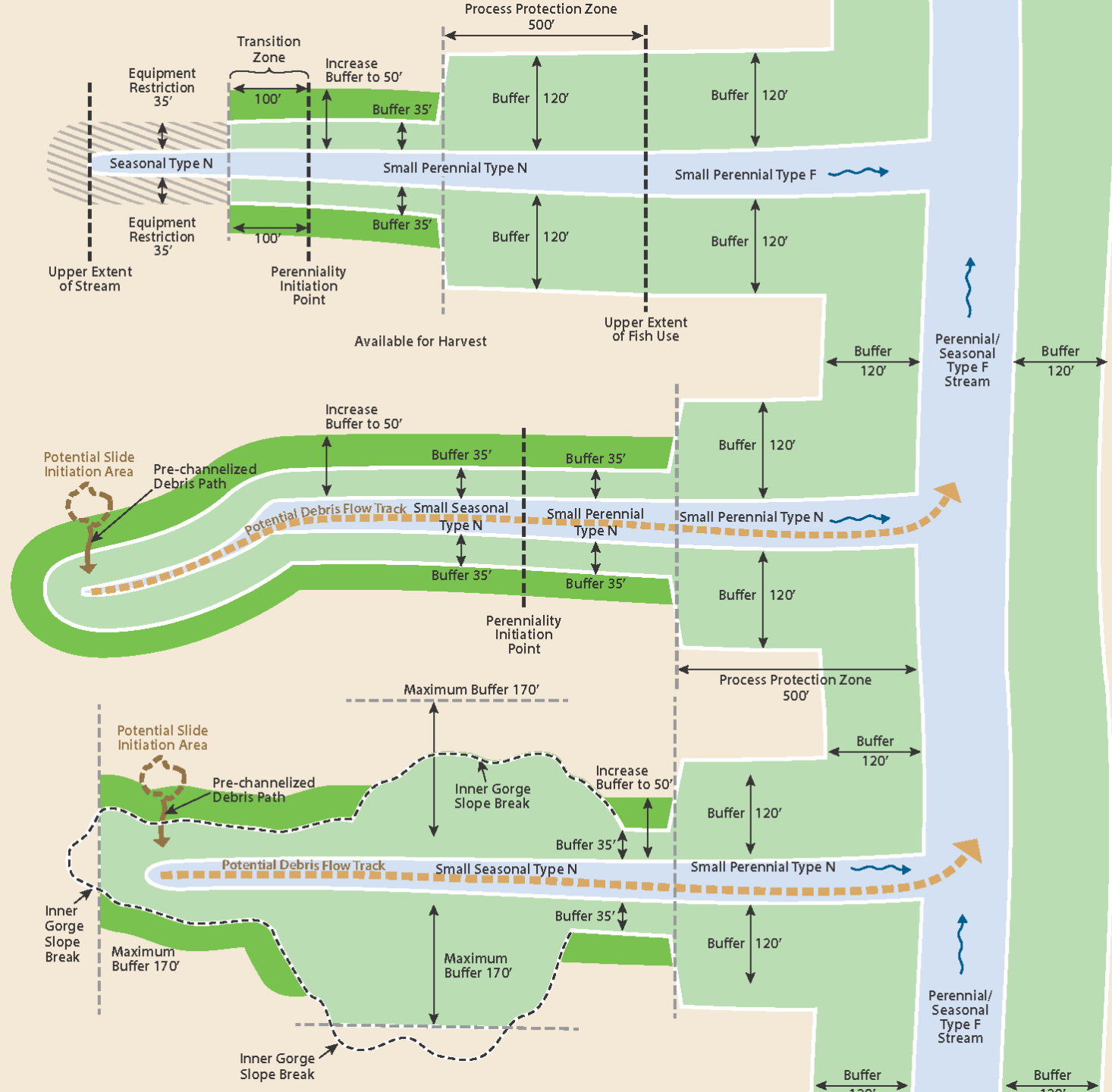


Overlap of Habitat Inside HCAs





Alt 3 Buffer Application





Water Yield Timing & RCA Durability

Water Yield and Timing

- Peak flows: 19 – 25% of basin < 10 years old
- OR Coast Coho ESU and ODF ownership
 - Kilchis River (82%)
 - Wilson River (79%)
 - Lower Nehalem River (79%)
- None exceed 20% threshold

Comparison of RCA Durability Over Time

- RCAs are designed to be resilient and durable
- No significant differences among Alternatives
- Thermal sensitivity modeling

Risk to Species Using Longer Range of Fire History

District	Number of Fires	Acres Burned	Average Acres Burned per Fire
Northwest Oregon	628	1,176	2
West Oregon & North Cascades	127	24,776	195
Western Lane & Southwest	458	1,845	4
Tillamook	1	47	47
Total	1,214	27,844	23



Process
Risk

Changes to the Proposed Action

- Increased time and analysis
 - Finalizing the HCP
 - Final EIS
 - Biological Opinions



Questions?

Mike Wilson, Division Chief

Michael.Wilson@odf.Oregon.gov

Nick Palazzotto, Resource Support Unit Mgr

Nick.Palazzotto@odf.Oregon.gov

Cindy Kolomechuk, HCP Project Mgr

Cindy.Kolomechuk@odf.Oregon.gov

Friday, November 11, 2022

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

Members of the Board of Forestry:

As a long-term member of the Neah-Kah-Nie School District Board of Directors, I understand the importance board members have on decision-making. As a board member, I appreciate the time you serve on the board and I value the opportunity to talk with you today. The Oregon Board of Forestry's decisions have a direct impact on the level of education Neah-Kah-Nie School District provides its students. In my brief presentation, I would like to share with you the unique history, and dependency on timber revenue, the Neah-Kah-Nie School District has with the Tillamook State Forest.

Neah-Kah-Nie School District serves approximately 800 students from Bay City to Manzanita and is heavily dependent on state timber revenue. I believe Neah-Kah-Nie School District is one the best school districts in Oregon. I am not the only one to believe this. The Oregon Department of Education recently recognized NKN for its success during the pandemic:

*The Neah-Kah-Nie School District was one of **the few Oregon districts** to show noteworthy growth in the latest state assessment results... Neah-Kah-Nie **bucked the trend** with encouraging improvements across the board in third and fifth grades. Third grade, a turning point in reading acquisition, is an indicator of early education success. Fifth grade is the foundation for stepping off to the tougher classes of middle school.*

*Dan Farley, Oregon Department of Education director of assessment, said it will take several year of comparable data to identify success factors, but **NKN growth was unique in Oregon.***

*Farley said about 50 districts with at least 95% participation and at least 10 students in the cohort, recorded a significant improvement in a grade or student group, but **Neah-Kah-Nie was alone in its success across subjects in multiple grades.***

Since the Neah-Kah-Nie School District does not receive Basic School Support and relies almost exclusively on state timber and local property taxes, the draft (HCP) and draft (EIS) would have a severe impact on our budget. Last year, NKN School District received approximately \$4.1M in state timber. This year, this amount will be reduced to \$3.1M and next year \$1.3-\$2.2M. A

projected nearly three million dollar funding reduction in three years will severely affect the services provided to our students.

On behalf of the Neah-Kah-Nie School District, I am writing to express concerns with the Oregon Department of Forestry's draft Habitat Conservation Plan and the draft Environmental Impact Statement. I am extremely concerned the ODF drafted a plan that will continue to reduce timber harvests on state forestlands, resulting in continued reduction in funding for our school district. My fellow school board members and I hope a better plan will be drafted before the process concludes.

I strongly encourage the Board of Forestry to take steps to ensure an equitable management plan that does a better job of balancing the social/financial needs of small Oregon communities while also employing effective and efficient environmental protections. In doing this, you will help the Neah-Kah-Nie School District continue to do our best for our students.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink that reads "Michele Aeder". The signature is written in a cursive, flowing style.

Michele Aeder

Neah-Kah-Nie School District Board of Directors

Audubon Society of Corvallis

*P.O. Box 148
Corvallis, OR 97339*

November 28, 2022

Oregon Board of Forestry
2600 State Street
Salem, OR 97310

RE: Western Oregon HCP

Submitted by email to: BoardofForestry@odf.oregon.gov

Chair Kelly and Members of the Board,

Thank you for extending the public comment period on your consideration of the Western Oregon State Forests Habitat Conservation Plan (SFHCP). Many of our more than 300 members live within Benton and Linn Counties, and most are engaged in community activities throughout northwestern Oregon. Our members travel widely around western Oregon to explore and enjoy birds, birding, and their habitats. We support the strongest habitat protection measures that can help assure the long-term viability of both SFHCP covered species, while providing a suite of economic and societal values from covered state forest lands that will benefit both local communities and the state of Oregon into the foreseeable future.

Adoption of an SFHCP can best serve local communities by reducing and stabilizing state lands timber harvest production, precisely when industrial timber harvests, marketing, and shipping demands are at their most volatile. Since harvest volume revenue from state lands greatly exceed private volume receipts, county governments rely on the stability that only long-term forest planning can provide. This is particularly true as more and more species warrant special protection measures. Without stability, county leadership is clearly frustrated, as demonstrated in testimony provided by representatives of your Forest Trust Lands Advisory Committee.

Without adoption of the strongest SFHCP alternative, forest species and habitats that are becoming increasingly imperiled by climate change (drought, increased disturbance by more extreme weather and wildfire events) will cause far more restrictions on future forest management options.

Finally, a very protective SFHCP should in some measure begin the reconstruction of forest carbon sequestration on state forest lands. Beyond discussions of species and their habitats, fully functioning forests provide Oregon cleaner air and more dependable water supplies. We support the Board of Forestry in its pursuit of the strongest protection measures offered under DEIS Alternatives #2 or #3.

Thank you all for your service on the Board of Forestry,

Jim Fairchild
Jim Fairchild, Conservation Director

*Audubon Society of Corvallis is a 501(c)3 charitable organization, Tax ID# 237-34-5969
Membership dues and donation amounts are fully tax-deductible.*

Message:

Please accept the following comments from Benton Forest Coalition, with 200 members in Corvallis and others throughout Western Oregon:

The Oregon Department of Forestry needs to recognize the importance of red tree voles as an indicator species of healthy forest ecosystems. Red tree voles are on the candidate list for recognition by USFWS as threatened or endangered under the ESA in the North Coast region, which includes many state forests. Currently the Northwest Forest Plan lists red tree voles as Category C, requiring pre-disturbance surveys and ten acre buffers for documented nest sites on Forest Service land in all of Western Oregon.

Red tree voles are arboreal mammals that live in the canopy and rely on cavities, forked boles and limbs, and other defects for nesting. Although red tree voles in most of Western Oregon consume Douglas Fir needles, the Distinct Population Segment subspecies (referred to as the Dusky Vole) in the North Coast region subsist not only on Douglas Fir needles but also Western Hemlock and Sitka Spruce needles.

Red tree vole populations throughout Western Oregon, and especially in the North Coast, are threatened with extinction due to habitat fragmentation caused by commercial logging. According to Dr. Eric Forsman (Forsman et al, 2016), the average size of a block of red tree vole habitat is just two percent of what it was one hundred years ago.

Red tree voles have a greater chance of persistence in closed canopy conditions, in the presence of mature or old growth forest. It would be prudent of ODF to conduct pre-disturbance surveys where appropriate, and apply buffers for documented nest sites to avoid eliminating existing populations leading to listing under the ESA.

Thank you.

Sincerely,
Reed Wilson

Corvallis, OR

State Forester Mukumoto, Chairman Kelly and Members of the Board of Forestry,

Thank you for the opportunity to speak before you as a small forest owner in support of the strongest possible Habitat Conservation Plan for our State forests.

Right now, to my mind, you are the eight most important and powerful people in the state of Oregon.

Climate change is accelerating faster than predicted, and no country or state is meeting the emission reduction goals they set, and which the best science says we need to meet. This is a true emergency, but we are not acting as if it is an emergency.

Oregon has one of the world's most effective assets for removing CO₂ and storing it safely longterm— our Pacific Northwest forests. Reducing emissions is complicated and takes time, but our forests are working for us now. All we need to do is protect them, and let them keep working. You cannot control management of all Oregon's forested lands, but our state forest lands are in your hands. I ask you to view every decision you contemplate in the management of our public forest lands through the lens of climate change. I ask you to consider the economics of harvest vs conservation in the broader, longer term context of the devastating economic effects of progressing climate change on all of Oregon, on our agriculture, our drinking water, the number of days unsafe to be outside due to heat, the need to provide safe and cooled indoor habitat for humans. Every older, bigger tree is producing more economic benefit for Oregonians by living, respiring, and continuing to grow, year after year, than it would provide in timber board feet in a one-time harvest. We should not ignore shorter term economic effects, but we cannot afford to sacrifice our most effective means of climate change mitigation to shorter term considerations. Other income sources should be sought; the effect on climate change of cutting the larger trees is irreversible. Mitigation of climate change, with its attendant human, ecological and economic disasters, needs to be acknowledged as the greatest permanent value of our public forest lands for all Oregon, and really for the world.

We can no longer assume our forests are a fully renewable resource. When we harvest a bigger, older tree, the tree that is most effective in mitigating climate change, we cannot assume that we will be able to plant a new tree of the same species and grow it to the same age and size. Climate change has changed that. Climate change is already affecting our forest tree health as

well as our agricultural crops. In my own forest I see the biggest Western red cedar turning brown, some already dying, and Western hemlock withering and putting out stress cones, some already dead. Please consider our bigger and older trees as likely to be irreplaceable once cut down, and protect them accordingly.

The species the HCP is designed to protect are important in and of themselves, but their greater importance is in what they tell us about the effects we humans are having on the health of forest ecosystems. We like to think we practice sustainable forestry, but for many decades we have been taking more than we put back. Climate change will make more species move to threatened and endangered status, but the healthier our forest ecosystem, the fewer species will become threatened.

Again, in my mind you are right now the eight most important people in Oregon. I respect and trust you, and I have much gratitude for your willingness to shoulder such heavy responsibility in these times of climate change.

I grew up with the Hawaii state motto, which still rings true for me:

Ua mau ke ea o ka aina i ka pono.

The life of the land is perpetuated in righteousness.

Thank you.

From: oregon-gov-web-services@egov.com
To: [ODF DL Board of Forestry](#)
Subject: Habitat Conservation Plan
Date: Monday, November 14, 2022 10:18:10 PM

Name	Charles Buffington
Email	[REDACTED]
Subject	Habitat Conservation Plan
Comments	<p>I am a 2nd generation Oregonian with two more generations standing behind and raised in the old growth forests of SW Oregon and managed a 400 acre ranch while commercial fishing. After the collapse of the timber industry in the 90's and poor fishing I had to uproot my family, sell my property, go back to school in my mid-40's and move to the Willamette Valley. I have produced food and fiber my entire life and love this state and all it HAD to offer. One merely has to take a drive up the Santiam Canyon to see the result of poor forestry management. My wife and I own a very small vineyard and winery in the Scotts Mills area. The Santiam Canyon fires devastated our crop and made our life miserable for weeks with no compensation. There appears to be a push to make state forest land little more than a tourist destination with few job opportunities for adjoining rural areas. Living on the south coast showed the variability of a tourist based economy. As more land is locked up the risk of wildfire increases dramatically. It should be note that little private forestland is burned in wildfires; only the Federal and State governments can afford to have their forest land destroyed. Please tread lightly in the attempt to have our state forests devoted to nothing more than fickle tourism industry producing few living wage jobs. Giving the homeless a place to live will never give them a path out of poverty whereas putting them to work 'fireproofing' state lands will make us much safer and help the cause of homelessness not merely treating the symptoms. Within a handful of years great grandchildren will be welcomed into the family, please do not destroy their legacy and continue to turn our forests into little more than smoke and ash</p>

Submission ID: 4427f754-20db-4b48-bd45-9142de6e0436

Record ID:

From: [John Christensen](#)
To: [ODF DL Board of Forestry](#)
Subject: Written testimony on Habitat Conservation Plan
Date: Saturday, November 12, 2022 11:25:48 PM

Members of the Oregon Board of Forestry: I appreciate the work you have done on drafting the Habitat Conservation Plan and this opportunity for the public to comment on that plan. Your decisions about the HCP will be pivotal to whether and how Oregon's state forests will be managed well into the future for maximizing the storage of carbon and protecting forest species such as the northern spotted owl, the marbled murrelet, the red tree vole, and others.

I am a small forest owner who has managed our family's 79-acre forest for several decades. I know the value of forests in providing wildlife habitat, protecting water resources, sequestering carbon, and providing personal and spiritual renewal to humans. We have entered our forest into a carbon sequestration contract that ensures enhanced storage of carbon in the trees and soil for over a century.

I appreciate several of the elements in your draft HCP, including the recognition of the certainty of climate change; a proactive landscape approach to protecting federally-listed threatened species; your incorporation of the best available science in setting biological goals and objectives; and for including practices that ensure that forests are resilient to wildfires, climate change impacts, and other disturbances.

I highly recommend that ODF co-manage the Habitat Conservation Areas not only for species protection but also as carbon reserves. The forests of Oregon and Washington have been proven to be the best in the world on a per acre basis for sequestering carbon, which is a critical natural climate solution to countering the earth's warming. Incorporating climate smart forestry into the HCP will help meet its biological goals for protecting species by growing trees for a longer duration, protecting mature and old growth trees from harvesting, and maintaining a diversity of forest species, ages, and structures. In the long run the economic value of climate smart forestry will be seen in its vital role in preventing the future costs of runaway climate change both to the human enterprise and the devaluing of future timber stocks.

You are members of the Board of Forestry at a critical moment in the long history of how Oregon manages its forests. I urge you to take the long view by incorporating climate smart forestry into your Habitat Conservation Plan.

Sincerely,

John F Christensen, PhD

[REDACTED]

Corbett, OR

[REDACTED]

November 16, 2022
Oregon Board Of Forestry Public Meeting

Thank you for providing this opportunity to testify. I own a home near Nehalem and am a full time resident there. I spend much time on the state forest hunting, fishing, hiking, photographing and seeking solitude. Myself and five of my nearest neighbors obtain our drinking water from a small stream part of which drains state forest land. I am a wildlife and fish biologist by passion and profession now retired.

I support Habitat Conservation Plan Alternative 3 with reservation. In view of the number and high value of the federal threatened and under review species found on our state forests such a plan is long overdue. That said I doubt Alternative 3 will actually be enough to do more than maintain the status quo for these species. The trauma caused by spotted owl habitat conservation plans and their lack of success was not because they were flawed but because they were implemented too late to save the owl in much of its former range. Whatever percent of the state forest is included in HCP's it will represent a much smaller percent of the total habitat because much of the forest is privately owned.

The history of counties' over dependency on state forests for budgets needs to change. These are state lands, not county lands and the counties turned them over to the states because they were no longer profitable to manage at the time. Timber harvest levels on state lands should no longer be driven by the ambitions of county budget writers. Neither the forests nor the counties should sacrifice to fund the Oregon Department Of Forestry's Greatest Permanent Value mandate to balance financial viability, conservation, and recreational opportunities for all Oregon people. Our politicians need to step up and provide additional funding for ODF from the general fund.

Ninety percent of the Pacific Northwest's old growth is gone. No surprise that threatened species are largely old growth dependent. On the coast range between Lincoln City and Astoria there remain only six old growth western red cedars. One is the Arcadia tree just south of here that is Oregon's largest tree. Five of them are in a stand near Rockaway Beach that is so rare a quarter mile boardwalk was built so people could marvel at them. If you haven't visited them it is well worth it and the biggest Rockaway Beach tree looks larger than the Arcadia tree to me. You won't find the Arcadia tree without a guide anyway. Sadly the habitat type represented by old growth western red cedar is functionally extinct in the coast range. There will never again be mature or old growth on the extensive private industrial forest lands in this area.

Threatened Coho salmon is a high profile species that needs increased habitat protection. Clean cold water is an obvious requirement for salmon, steelhead and many other species. It is also a vital need of the people of our area for drinking and for agriculture. Here in Tillamook County dairy is a big industry and a milk cow needs 30-50 gallons of water a day. I believe the case can be made that clean cold water is the most valuable yield of our forest lands now and will become more valuable as our climate warms. We know that shading from mature trees lowers water temperatures. We know that forest roads, especially new ones, contribute sediment to rivers that choke off spawning gravels and damage irrigation pumps and municipal water systems.

As I wrote this it seemed to me habitat conservation plans shouldn't be all that difficult to come up with nor do they need to be complicated. 1. Retain all old or mature trees on the forest and manage most younger stands to achieve future old growth. 2. Build no new roads. That pretty much covers it.

Ted Chu - 41400 Anderson Rd, Nehalem 971-227-3422 yuiqwe1@gmail.com



COALITION OF OREGON LAND TRUSTS

511 SE MORRISON ST. PORTLAND, OR 97214 • 503-719-4732 • OREGONLANDTRUSTS.ORG

Board of Forestry
2600 State Street
Salem, Oregon 97310

November 28, 2022

RE: COLT Comments on Department of Forestry Support for Forest Legacy Program

Dear Board of Forestry Members,

On behalf of the Coalition of Oregon Land Trusts (COLT), I would like to thank you for including us in the November 17th Board Forestry Field Tour. We appreciate the opportunity for COLT's Conservation Program Manager, Karsyn Kendrick, to attend and speak in support of the Forest Legacy program in Oregon at the Northrup Creek Horse Camp.

The Coalition of Oregon Land Trusts represents 32 member organizations (land trusts and conservation organizations) that work to protect clean water, fish, and wildlife habitat and working farms and forests across the state. Our mission is to serve and strengthen the land trust community in Oregon, and together, our members have worked with private landowners to conserve over 370,000 acres of land, much of which is forested. Our coalition works to advocate for the programs and funding land trusts and communities need to protect Oregon's special places—including our working forests.

As one of the most important forested states in the country, Oregon has the potential to be a national leader in forest conservation. We are at a crucial moment in time to make this happen. The federal government is investing an additional \$700 million in the Forest Legacy program through the Inflation Reduction Act. Forest Legacy prevents the fragmentation of forestland through easements that provide drinking water protection, habitat for fish and wildlife, recreational opportunities, and



24 MEMBER ORGANIZATIONS: Blue Mountain Land Trust • Center for Natural Lands Management • Columbia Land Trust
Deschutes Land Trust • Ducks Unlimited • Forest Park Conservancy • Friends of the Columbia Gorge Land Trust
Greenbelt Land Trust • Klamath Lake Land Trust • Lower Nehalem Community Trust • McKenzie River Trust
North Coast Land Conservancy • Northwest Rangeland Trust • Oregon Agricultural Trust • Oregon Desert Land Trust
Pacific Forest Trust • Southern Oregon Land Conservancy • The Conservation Fund • The Nature Conservancy in Oregon

The Trust for Public Land • The Wetlands Conservancy • Wallowa Land Trust • Western Rivers Conservancy • Wild Rivers Land Trust
8 ASSOCIATE MEMBER ORGANIZATIONS: Black Oregon Land Trust • Cerro Gordo Land Conservancy • Clackamas Soil & Water
Conservation District • East Multnomah Soil & Water Conservation District • Helvetia Community Association
Tualatin Soil & Water Conservation District • View the Future • Yamhill Soil & Water Conservation District



management strategies that support local economies through sustainable timber harvest.

Oregon entered the Forest Legacy program in 2001, and began implementing it in 2007. So far, the program has preserved iconic landscapes like the East Moraine Community Forest in Wallowa County, Eugene Wetlands, the forests of Spence Mountain on Klamath Lake, Gilchrist State Forest, Blue Mountain Heritage Ranch, and Arch Cape Community Forest.

A moment of investment like this may not come again, and we have to make sure that Oregon is ready. On the coast, we can look at impactful projects like the Rainforest Reserve, a 3,500 acre forest whose protection will conserve almost an entire watershed, connect existing conserved lands, protect rare ecosystems, and provide local jobs. This type of large-scale forest protection project is exactly what the Forest Legacy program is designed to do.

Because of the Forest Legacy Program, anyone standing on Cannon Beach can look behind them and know that the forest they see spanning up to the highest points of the coast range will be here forever—as forestland.

We at COLT want to make sure that additional Forest Legacy funding comes to Oregon. **That is why COLT supports the Department of Forestry's ARB request to increase their Forest Legacy coordinator from 0.75 FTE to a full-time position, and provide increased capacity to get projects across the finish line.**

Over the past six months, COLT has been convening a group of partners that all share an interest in maximizing Forest Legacy in Oregon, including land trusts, representatives from the regional Forest Service office, and Amy Singh from Oregon Department of Forestry. This group is working to identify barriers and solutions to streamline the Forest Legacy program and ensure there is a pipeline of successful projects ready to go when Oregon can apply to receive additional funding.

We know there is demand in Oregon for increased Forest Legacy funding. The Trust for Public Land, Deschutes Land Trust, McKenzie River Trust, Pacific Forest Trust, and Columbia Land Trust all have potential projects that this program can support. Some of them can be described as once-in-a-generation opportunities to protect private forestland from fragmentation and conversion. Over the years, we have seen the pipeline of potential projects grow in size, caliber, and impact.

COLT is a partner in this effort to increase funding for forest conservation, community forest protection, and the protection of clean drinking water sources in Oregon. But we need to build capacity at the state level as a first step toward making that happen.





Our members and our tribal partners across the state are poised to be a part of this effort to increase Forest Legacy funding in Oregon. We hope to work cooperatively with the Oregon Board of Forestry and staff to grow and sustain a robust Forest Legacy program in Oregon. Thank you for your service on the Board of Forestry and thanks to your staff for including COLT in your November field tour. We hope you, as leaders of the Agency, join us in supporting this program for Oregon.

Sincerely,

Kelley Beamer
Executive Director, Coalition of Oregon Land Trusts



November 11, 2022

Oregon Board of Forestry
2600 State Street
Salem, Oregon 97310

Dear Chair Kelly and Members of the Board of Forestry:

The Coast Range Association (CRA) is writing to share our view on state forest management. Based on past Oregon Attorney General Opinions and the resolution of the Linn County lawsuit, the Board of Forestry has broad discretion over the management of state forests. We believe the Board should adopt a strong Habitat Conservation Plan (HCP).

The CRA supports your work on a Habitat Conservation Plan for Western Oregon State Forests. We ask that you support HCP Alternative 3, the conservation alternative. Alternative 3 will not only protect habitat for threatened and endangered species, but also support the implementation of the Climate Change and Forest Carbon Plan.

The debate over the State Forest Habitat Conservation Plan has made clear; the overriding issue for the Department of Forestry and local taxing districts is the need for systemic changes to funding. Funding solutions are the responsibility of the Legislature and the Governor. A Department of Forestry serving all Oregonians needs to be funded through the General Fund.

A November, 2022 report* by the Oregon Center for Public Policy states “*The wealthiest 1 percent of Oregonians collectively own about \$588 billion, more than a third of all wealth in the state and more than the bottom 90 percent of Oregonians own together.*” All the while, many, if not most, rural areas see economic decline and population loss. The Coast Range Association avoids stakeholder processes that argue over the scraps of policy space left over by the undue influence of concentrated wealth and corporate power.

Proper, fair taxation for local governments and taxing districts requires changes to the state’s constitution. A new constitutional ballot measure is required to return Oregon to a common sense system of taxation.

Thank you for your commitment to managing state forests for the greatest permanent value for all Oregonians. Such management is no small challenge given a system of taxation that hinders service to the common good.

Sincerely,

Chuck Willer
Executive Director
Coast Range Association

* Oregon Center for Public Policy report **Wealth Inequality in Oregon Is Extreme** accessed at: <https://www.ocpp.org/2022/11/03/wealth-inequality-oregon-extreme/>



September 6th, 2022

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

Re: HCP/DEIS

Dear Board Members:

Washington County has been following the Board of Forestry's work on the Habitat Conservation Plan (HCP) and Draft Environmental Impact Study (DEIS). On June 2, 2022, the Washington County Board of Commissioners convened a roundtable and discussed the HCP/DEIS and its impact on the 45,514 acres managed as forest land in our county.

The Washington County Board of County Commissioners appreciates the work the Board of Forestry has done through the HCP/DEIS in balancing the many interests of our state and the need to comply with the Federal Endangers Species Act. Washington County, like the state, has consistently supported forest management to support sustainable timber harvest, ample recreation, protected wildlife and their ecosystems, and clean water.

In advance of your Sept 7th, 2022, meeting, please know I and the undersigned district commissioners **support the HCP/DEIS** as an admirable balance of varied interests and is consistent with the county's previous position as stated in county Resolution and Order 13-27 supporting the Board of Forestry's efforts to implement conservation areas and modernize forestry policy.

I and the undersigned district commissioners **encourage the Board of Forestry to adopt the proposed action of approving the HCP** which will give certainty to a sustainable timber harvest,

Board of County Commissioners
155 North First Avenue, Suite 300, MS 22, Hillsboro, OR 97124-3072
phone: (503) 846-8681 • fax: (503) 846-4545



protect habitats, preserve our forests, clear air and water resources, and give our people ample recreation opportunities here in Washington County and throughout our state.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kathryn Harrington'.

Kathryn Harrington, Chair,
Washington County Board of Commissioners

A handwritten signature in brown ink, appearing to read 'Nafisa Fai'.

District 1 Commissioner Nafisa Fai

A handwritten signature in blue ink, appearing to read 'Pam Treece'.

District 2 Commissioner Pam Treece



Clatsop County

Board of Commissioners

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

November 28, 2022

Oregon Department of Forestry
2600 State Street
Salem, OR 97310

The Clatsop County Board of Commissioners has significant concerns about the financial impacts of the Draft Western Oregon State Forest Habitat Conservation Plan (HCP) on already constrained rural local governments. These concerns have been underscored in a letter submitted to NOAA during the public comment period (May 26, 2022) and a Board of Commissioner approved proclamation dated October 14, 2022.

As a summary of our financial impact analysis, the projected 30-38% reduction in timber revenues due to implementation of the current draft of the HCP, equates to a net loss of \$2.7 to \$3.4 million per year for Clatsop County government and \$4.5 to \$5.7 million loss to other local taxing jurisdictions – for a total estimated reduction of \$7.2 to \$9.1 million in local government revenues per year. This level of reduction will impact every part of our organization and community. It will degrade both services and service levels for generations to come and impact those most in need in our communities.

Clatsop County contends the HCP should fairly and equitably acknowledge and balance, social, economic and environmental factors. To date, the impacts on local government services and service levels has not been discussed in earnest or addressed satisfactorily. The simple truth is the projected reduction in timber revenues will have a material impact on public safety, education, health, roads and other critical public services with no ability to offset at the local level (given local government financing limitations). The Board of Forestry and state cannot merely dismiss this as a local government issue to solve.

During the recent Board of Forestry meeting in Seaside, public testimony included the notion that local government timber revenues be decoupled from the management of state forests; further suggesting local governments request the legislature offset state timber revenues with state general funds. While we agree the state should compensate the County for lost timber revenues, the mechanism(s) and approval for such offsets must be in place prior to the implementation of the HCP. It is not good public policy to identify the significant impacts of a policy and not have a comprehensive plan to ameliorate.

The services provided by counties, cities, school districts, rural fire districts and health districts are essential for the health, well-being, safety and sustainability of our communities; they are not luxuries. If the draft HCP reduces local government revenues to a tune of \$9 million per year in Clatsop County; the implementation of the HCP should be dependent/contingent upon approved revenue offsets from the state.

The Board of Commissioners continues to request the Board of Forestry reconsider the current version of the HCP and collaborate with local governments to develop an HCP that fully considers social, economic and environmental impacts.

If not amenable to this suggestion, we ask the current draft version of the HCP not be implemented until the state agrees to offset the loss to local governments. This is an issue of equity, fairness and the viability of a rural community of 40,000 residents.

We ask you to partner with us to either improve the current draft plan; or delay implementation until these significant financial issues can be adequately addressed by the state.

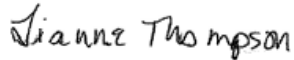
Thanks for your consideration.



Mark Kujala, Chair, District 1



John Toyooka, District 2



Lianne Thompson, Vice Chair, District 5



Courtney Bangs, District 4



Clatsop County

Board of Commissioners

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

November 28, 2022

Oregon Department of Forestry
2600 State Street
Salem, OR 97310

While Clatsop County supports the development of a Western Oregon State Forest Habitat Conservation Plan (HCP), the current version introduces any number implications/concerns for our rural community, including 1) reduced local government revenues, 2) reduced local government services and service levels, 3) elimination of family-wage jobs supporting all corners of our rural county; 4) reduced activity for ancillary support businesses; 5) impacts on the social fabric of our community, including schools, healthcare, not-for-profits and civic organizations.

Beyond the financial impacts on local governments, which are devastating in their own right, we are also concerned about the economic and social implications of the HCP. In rural communities like ours, we need more family wage job creators – not less. Not only does timber provide vital discretionary revenues to local governments, but the industry also provides and/or supports a wide range of family-wage jobs, businesses and philanthropic activities.

Family wage jobs are the cornerstone for a healthy and sustainable community, the HCP development process should consider the impacts of job loss on our rural economy. Clatsop County does not have the transportation system and developable lands (including industrial) to make up for the loss of timber supported jobs. The state needs to be circumspect on the impacts of the HCP, as your decision will influence this community for generations.

Clatsop County continues to ask for balance between social, economic and environmental factors while encouraging the state to postpone the approval of the draft HCP and reengage with local elected officials to address the factors in a more nuanced and equitable manner.

In addition, we are concerned about wildfire and how the draft HCP might impact future wildfire risk. We have long-standing evidence that passive approaches to forest management greatly increases accumulations of ground fuels, and canopy closures, thereby contributing to the risk of catastrophic-scale wildfires. We need to learn from the mistake of others and actively manage the forests, while providing common sense and reasonable environmental protections for wildlife and waterways.

We respectfully ask the Board of Forestry to delay the approval of the draft HCP and reengage with the counties and other local stakeholders to develop a plan that will not undermine our community and the institutions and businesses that make it safe, livable and sustainable. While the state forests are a statewide asset and resource – do not forget about those that live and work in Clatsop County. The quality of our life, our businesses, and our institutions should matter and be a consideration as well.

For the sake of equity and fairness, please work with us to develop a better and more balanced plan.

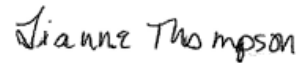
Thank you for your consideration.



Mark Kujala, Chair, District 1



John Toyooka, District 2



Lianne Thompson, Vice Chair, District 5



Courtney Bangs, District 4



BOARD OF COUNTY COMMISSIONERS
PUBLIC SERVICES BUILDING
2051 KAEN ROAD | OREGON CITY, OR 97045

November 9, 2022

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

RE: HCP/DEIS

We are writing individually as commissioners of Clackamas County to emphasize the comments submitted by the Clackamas County Forester regarding the Habitat Conservation Plan (HCP). In particular, we are disappointed in the Oregon Board of Forestry's limited engagement with affected jurisdictions. Additionally, we submit these comments:

- We request more information about how recent changes in the landscape of the forest lands would be addressed under the HCP.
- We request more information about ongoing revenue potential accounting for protected, harvested, and burned forest lands.
- We support the County Forester's request that the HCP in Clackamas County be re-evaluated and any lands proposed to be protected, but no longer providing the anticipated habitat, be removed from protection under the HCP and be put back in the normal forest management matrix.

As county commissioners, we value public process, transparency, and public lands that work for the benefit of the public. We would like to collaborate on important rulemaking that can affect so many.

Please keep us apprised of any future updates or engagement opportunities. You may send communication to bccmail@clackamas.us.

Sincerely,

Tootie Smith, Chair

Mark Shull, Commissioner

Thanks to the Oregon Board of Forestry for once again allowing input on the Habitat Conservation Plan being considered for approval. My name is Cheryl Conway. I live in Astoria. This is not the first time I have submitted written testimony to support an enhanced HCP. I continue to write testimony because of how deeply I feel about the forests of Western Oregon and declining salmon populations. I believe changes to current forestry practices on public lands must be modified if we want productivity improvements and improved salmon runs in the long term.

Treating forests as tree farms diminishes the viability of the soil. I have seen friends who are Midwest farmers apply larger and larger amounts of fertilizer just to maintain continued harvesting of crops because once rich soils have become nothing but infertile dirt. The Great Lakes experience algae blooms that poison drinking water for cities as a result of this excessive fertilizer flushing from the fields to the streams and rivers. Farming forests doesn't just diminish the soils and waterways but also causes catastrophic collapse of the ecosystems within, and collapse of the industries such as salmon fishing that rely on them.

I realized the interconnection between the health of our forests and the health of our salmon runs when studying Oregon habitats at Portland Community College. It magnified the awe I felt the first time I saw a salmon spawning in Sandy River. Think about how much of the nutrients necessary for life flow unendingly to the sea. How can any area survive this constant erosion of what sustains life? That's where the salmon enter the equation. Every year, millions of adult salmon return these valuable resources back to the lands from which they came. However, as the forests are cut, streambeds are covered with silt, warm, evaporate, disappear. Fewer salmon smolts head out to sea. Fewer adult salmon return to renourish the forests.

The scientific evidence is clear. Replanted areas are getting less productive, requiring fertilizer to replace the salmon that never made it home. As the health of the forests decline, our salmon fishing industry is collapsing. We are running out of time to reverse these declines.

While a strong HCP can help restore the health of these interconnected parts of our environment, I must also acknowledge the economic harm Oregon may suffer in the short term as we transition to better forestry practices. It is unacceptable to expect county governments to support the HCP without also providing funds to offset the loss of income they may experience during the transition. Compensation for the salmon fishing industry should also continue as we cut quotas to allow the salmon populations to rebound.

Every Oregonian has benefited from our forest and fish resources. We must all help to offset the financial losses until the HCP begins to pay off down the road. The only alternative is unhealthy forest farms devoid of functioning ecosystems. That would be the end of the Oregon we all love.

Sincerely,

Cheryl T. Conway
Astoria, OR



November 16, 2022

Oregon Board of Forestry
2600 State Street
Salem, Oregon 97310



*In the gal
who testified
in CAUTION orange!
😊*

Dear Chair Kelly and Members of the Board:

First and foremost, **thank you** for your visionary leadership in supporting the *Western Oregon State Forest Habitat Conservation Plan (HCP)*. I also value your willingness to travel to Seaside to experience our forests and accept public testimony from local residents who serve as your partners in forest stewardship. Despite the Oregon Plan for salmon and watersheds drafted decades now, until now, Oregon has never taken adequate action to recover species of concern including habitat protection for salmon streams within our state forest lands. **This HCP, through its Alternative 3**, promises to remedy that neglect, providing hope for future generations of salmon *and* the human communities which rely upon healthy forests, fish, and wildlife.

Anyone who fishes western Oregon rivers knows important fish species have been driven to dangerously low levels. Long gone are the huge wild Chinook which fed the bellies and spirits of Lower Columbia families since time immemorial. Instead, local rivers frequently fail to meet minimum salmon escapement goals for key stocks. Trickle-down impacts of this loss are real and sometimes devastating. This year, salmon closures in the Tillamook, combined with limited opportunities in North Coast watersheds crippled the lucrative (\$200 million annual) sportfishing industry which supports tourism revenue for hotels, restaurants, and all those who work along the waterfront.

As a local angler, it's heartbreaking to go fishing and catch no fish, or be forced to keep only hatchery coho, and pray for the fate of that rare wild Chinook which may or may not survive catch-and-release. This year, weeks went by with nary a skiff on our Lower Columbia salmon grounds. It did not feel right. **Abysmal salmon returns are clear indication of a critical problem. And managing state forests to fully protect and enhance salmon watersheds is a critical solution**—for the fish themselves and the rural economy those fish support. I urge this ODF Board to always remember: **wild salmon and steelhead are an important forest product, too!**

I've read the fine print of the EIS, and securing maximum protections modeled under **Alternative 3 "increased conservation"** reads to me to be a no-brainer. The principles of Alternative 3 are simple: **fully protect salmon spawning streams**; manage state lands to support timber, wildlife, *and* clear, cold forest streams. And give our local runs a fighting chance to recover. I was angered to read my County Commissioners scare-tactic hype about speculative, exaggerated economic impacts of standard watershed conservation measures.

The proposed actions of Alternative 3 are supported by sound fishery science: provide stream shade; promote woody debris; prevent landslides; employ healthy riparian buffer zones; enforce sensible road design. In short, **maintain state forest streams as real streams!** For me, the kickback is hypocritical and short sighted: many local

loggers love their wild fish as well. Many in the timber industry have worked commercial or sport fishing jobs as well. **Balanced management makes sense for everybody**; however, rural Oregonians requires strong state leadership to assure industry acts sensibly.

As a conservation voter and climate action advocate, I believe timber harvest in 21st century **PUBLIC** forests should be treated as a privilege. We shouldn't need an EIS bullet point to keep equipment out of streams. Still, profit margins and stubborn "don't tread on me" attitudes still rule the day. **That's why I applaud this Board for immediately adopting measures to regulate those who might damage our public resources with careless speed or senseless greed.**

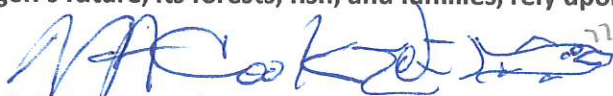
I also encourage this Board to lead Oregon to re-design new business models for distributing timber revenues from public lands. **As a career public educator and concerned conservation voter, linking timber revenues to education and public safety budgets has never felt right.** The current arrangement effectively buys "pro-timber sentiment" in rural communities, making it challenging for public employees to speak their values about important topics. Balancing a school district budget by pursuing aggressive harvest is plain wrong in the 21st century. It's also a planning nightmare for those tasked to manage state operations around an eternally illusive "timber revenue" budget item. Today's system incentivizes corruption and nepotism within county governance and derails efforts to secure more appropriate, sustainable revenue generation appropriate for our time. * *

Decoupling Clatsop County's timber harvest/county revenue relationship would be a win-win for the North Coast, removing budget uncertainty while fulfilling ODF's obligation to manage public lands for multiple uses: economical, ecological, and recreational. As it stands, the timber industry of Clatsop County owns ample private land and benefits from deep-rooted political alliances involving timber barons like outgoing State Senator Betsy Johnson and several County Commissioners. While state forests can support sustainable timber harvest, clearcutting public watersheds has no place in the 21st century. It's the Board of Forestry's job to transcend local politics to assure public forests **also** support fish, wildlife, healthy watersheds, and mature carbon sequestering stands for future generations. I'd like to see Clatsop County generate revenue through carbon trade mechanisms which incentivize keeping trees on the land—**especially** in riparian zones.

I'm 53 years old now, and I've witnessed the startling impacts of our changing climate here in Oregon. and especially in Alaska where glaciers are disappearing, sea levels are rising, and permafrost is melting at startling rates. Climate science has clearly proven the important benefits of keeping trees on the landscape--to support fish, wildlife, clean water, **and** mitigate the harmful effects of a warming atmosphere which further compromises our state's forests. Watching conifers turn brown in August, needles quite literally singed by heat waves that turn forests into tinderboxes is scary to witness. The demographics of Oregon's North Coast have changed rapidly in recent years, and so have taxpayers' values. My neighbors today include climate refugees displaced due to wildfire. **ODF should manage our remaining state forests to reflect those broader Oregonian values and concerns. Managing public lands to embrace enhanced conservation principles is a necessary move for a 21st century Board of Forestry.**

Again, I thank you for your support of this Habitat Conservation Plan and urge you to move forward with **Alternative 3**, protecting key watersheds to the best of your abilities. I also empower this Board to lead Oregon towards decoupling approaches which alleviate county budgets from problematic reliance on timber revenues. Rural Oregonians should not be forced to choose schools and other public services over healthy forests, fish, and wildlife. The time is now to embrace balanced management principles for our remaining public forest resources. **Oregon's future, its forests, fish, and families, rely upon your wise leadership.**

In community,



Nancy A. Cook, Astoria, Oregon homeowner, mother, educator, angler, forest recreator, climate activist

From: [Sue Craig](#)
To: [ODF DL Board of Forestry](#)
Subject: Strengthening the Western Oregon State Forests Habitat Conservation Plan
Date: Thursday, November 10, 2022 6:16:53 PM

Dear Chair Kelly and Member of the Board of Forestry,

I would like to comment on the proposed and developing HCP which you are all hard at work thinking and planning for our future.

Future is truly what this is all about. You all know the difficulties that we are facing, and will face as the days and years tick by. Please consider Alternative 3. We need the MOST protective plan for our fish and all wildlife, plus what it will give for our descendants.

I am 85 years old. I will probably not live to see the dire things that are coming, though they are coming very fast.

What you plan, should take in a really big picture of conservation of water, clean air, carbon sequestration, and the true care of our interconnected web of ALL life.

Wow...you may want to leave this Board considering what you are being asked to do.

Among other creatures, I love beavers, and hope you will especially help these beings who are keystone to so much in our lower forests.

Thanks Sue Craig Eugene [REDACTED]

P.S. Hope you got to read "Braiding Sweetgrass".

Dear [Oregon Board of Forestry],

Personalize your message

Dear Chair Kelly and Members of the Board of Forestry,

Thanks for leading the Oregon Department of Forestry.

I'm writing as a life long commercial fisherman who has also worked in the logging industry. I've supported my family catching salmon in Alaska, Oregon, Washington, Columbia River, offshore. I've fished salmon up and down the West Coast, and the bottom line is simple: salmon need healthy stream beds to spawn in. Spawning salmon need clear, cool water. And clean gravel beds, period. Logging watersheds should be closely regulated, to include the enhanced measures of this HCP plan. And that comes from a guy who has worked as a logger, too. I believe a lot of logging companies are trying to do better, but we've reached such a tipping point with salmon stocks and the environment in general. We need strong leadership.

At age 76, the thing that bothers me most is the infighting. Pitting loggers against fishermen--or charter skippers against commercial fishermen. none of that works. We all need fish. We all need a healthy climate. We all need healthy forests to support those fish and foresters. As a fisherman, I feel the resource has been managed politically instead of biologically for far too long. And that's why we need a Board willing to see the overall picture and make choices that are beneficial for BOTH industries.

Here in Oregon, we've been opposing each other far too long instead of trying to work together for the benefit of both industries. Everybody should be at the table figuring out how to do this right. The right plan should be a win-win situation for all. And that means protecting the streams for the fish.

Sincerely,

Mr. David Densmore

E Mooring Basin Q Float Stall Eleven Astoria, OR 97103

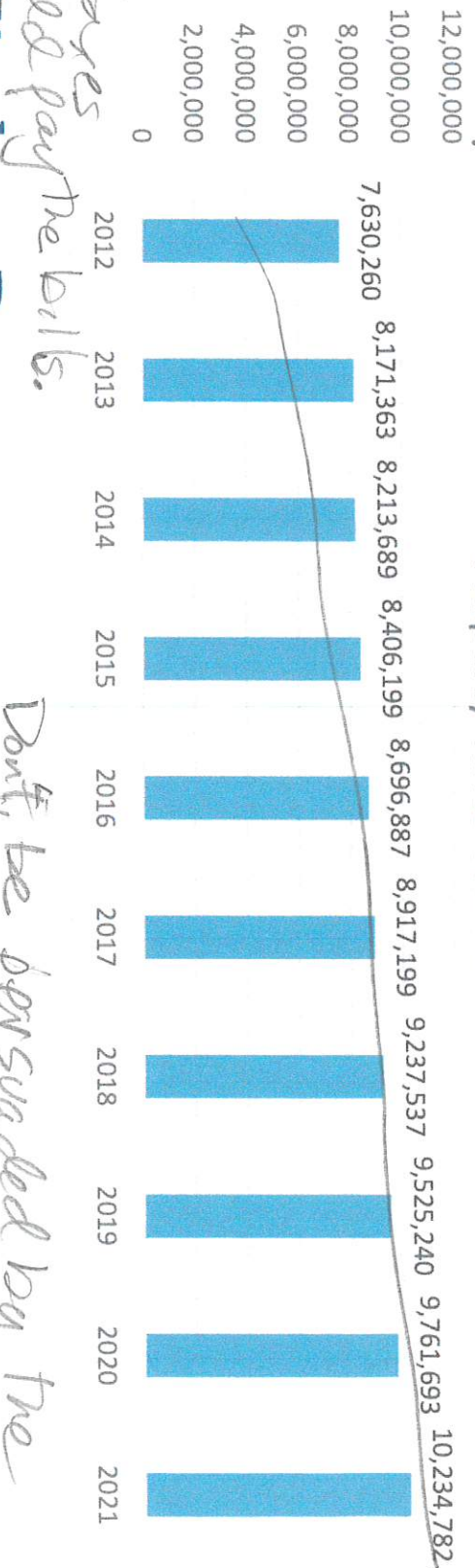
dhdensmore@yahoo.com

*Former logger supports HCP A43
even wishy to END the infighting.*

*Don't Miss This He He!!
Thanks.*



Matson County Budget Dec. 2022
Property Taxes Collected



Property taxes can't should pay the bills.

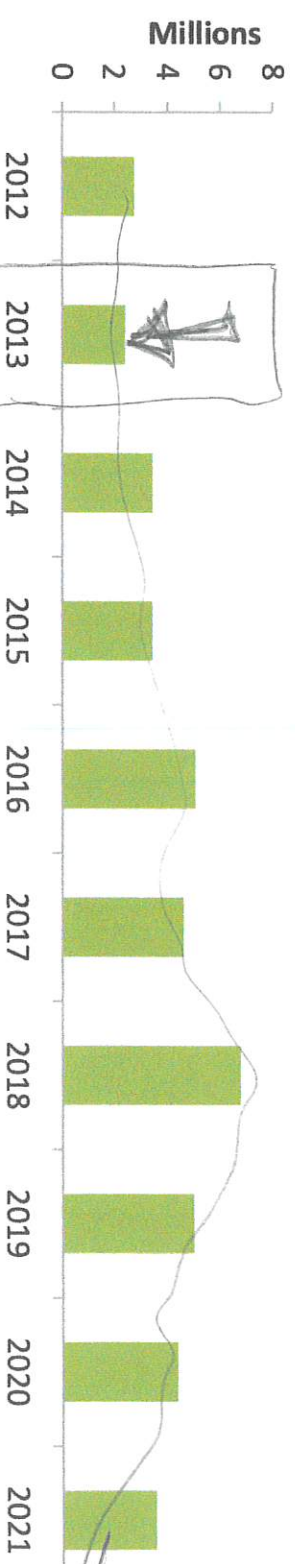
Timber Revenues

Don't be persuaded by the scare tactic hype.

In addition to property tax revenues the County's General Fund operating Budget relies on revenues from timber sales that occur in the State Forest Trust Lands for approximately 13% of its total budget. These revenues fluctuate greatly and are heavily influenced by economic factors. To help offset the volatility of timber revenues the Board of Commissioners has adopted a policy that the General Fund is to retain no more than the lowest year of actual timber receipts over the last fifteen (15) years. All other timber monies received are to be transferred to be used to fund General Fund capital projects and the General Fund Stabilization account.

Timber Revenues

We are talking about \$2 million dollars



MAA Book



11/16/2022

TESTIMONY IN FAVOR OF THE HCP

note Six years ago the Clatsop County Commission voted to opt out of the legally bogus Linn County Timber Lawsuit. In his statement the night of the vote, Chairman Scott Lee said, "the overwhelming message from emails, phone calls and public testimony has been in favor of balanced forest management and against the Linn County Lawsuit."

note Lee added, "We support the integrated and multi-benefit approach to Greatest Permanent Value that the Board of Forestry adopted in 1998". That has been the position of Clatsop County since 1998 and it should be the same today." *end quote*

However, the current Clatsop County Commission is an outlier to our county's perennial position in protecting the values associated with the HCP; wildlife habitat, clean drinking water sources free from the contamination of aerial spraying, public recreational opportunities, carbon sequestration and a reduction of timber harvest on state land. While giving lip service to these values, several of the current commissioners who were in favor of joining the Linn County Timber Lawsuit, which was initiated and bankrolled by the timber industry, are still serving the industry's interest in ~~increasing~~ logging on state land.

Current ~~commission~~ rhetoric about a devastating impact on county public services if the HCP proceeds does not jibe with the on-line Clatsop County Budget in Brief which states that only 5% of the total resources from all funds combined comes from timber harvest on state land.

Let the timber industry continue to log on the 34% of Oregon forestland they own leaving the 3% managed by the state to be restored. The revenues from timber for the counties could easily be recovered and then some by a reinstatement of the severance tax on private timber harvest, ~~which was abandoned in 1993.~~

Roger Dorband
462 6th Street
Astoria Oregon 97103
info@ravenstudiosart.com

November 10, 2022

Dear Chair Kelly and Members of the Board of Forestry:

I appreciate the policy guidance you, as the Board of Forestry (BOF), provide to the Oregon Department of Forestry (ODF). Your dedication, the technical expertise of ODF staff and input from community members make for a strong foundation for sustainable forest management in Oregon.

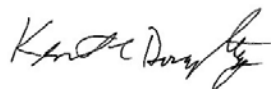
I am a resident of Tillamook County and have resided in Oregon for the last seven years. I previously lived in Washington state where my professional capacity as a water quality scientist included work on riparian forest practices. When I moved to Oregon, I was dismayed at the lack of sufficient riparian buffers on many fish bearing and non-fish bearing streams. Today, you can put Oregon forests on an improved path to sustainable forest practices that ensure the full range of ecosystem services provided by healthy forest and stream habitats. Please ensure that the Habitat Conservation Plan for Western Oregon State Forests (HCP) is robust, science-based, and truly protective of imperiled species.

ODF is directed to manage Western Oregon state forests to achieve the “Greatest Permanent Value” to the state, including social, economic, and environmental values. Timber production is a part of our local economy but so are healthy fisheries, safe drinking water for our communities, and the inspiration both residents and visitors draw from mature forests.

I support HCP Alternative 3 as it provides better riparian buffers that are necessary to protect water quality and aquatic species including ESA listed salmon. The riparian buffer widths prescribed in the HCP provide better resilience to climate change through shading streams as well as filtering sediment, and maintaining aquatic habitat structural integrity. Best available science suggests even greater protection measures for forest streams.

I urge you to adopt an HCP that, at a minimum, provides the protection of HCP Alternative 3 and sets forest practices in Western Oregon state forests onto a path to ensure the greatest permanent value for all Oregonians now and into the future

Thank you



Kent Doughty

██████████
Cloverdale OR ██████████
██



ENGLUND MARINE & INDUSTRIAL SUPPLY

95 Hamburg Ave * PO Box 296 * Astoria Oregon 97103
Phone: 503-325-4341 * 800-228-7051 * Fax: 503-325-6421
www.englundmarine.com

November 15th, 2022

Dear members of the Oregon Board of Forestry,

I am writing today with regards to the Western Oregon State Forest Habitat Conservation Program.

Englund Marine & Industrial Supply has three locations along the Oregon coast—Astoria, Newport and Coos Bay. Although we are mainly a supplier of boat and fishing gear, we do quite a bit of business with the timber industry in areas such as hydraulics, hardware and outdoor clothing.

Like many industry-support businesses we will see a decline in sales if harvest is significantly cut back. Businesses in small, rural communities often need a broad customer base to thrive. The timber industry is definitely a significant part of our customer base in which we depend on.

Harvest cutbacks will also negatively affect the marine side of our business. Many of our recreational fishermen are employed in the timber industry, and spend their recreational dollars sportfishing. This is an example of how dollars flow through small communities, and how economic cutbacks in one industry affect an entire community.

We urge you to keep any harvest cutbacks to a minimum.

Sincerely,

Kurt Englund
Englund Marine & Industrial Supply

Comments on the Public Draft Habitat Conservation Plan

Dear Board Members,

I support the Public Draft HCP and ask the BOF not to consider any modifications to the plan. Any modifications risk stalling the NEPA process and delaying implementation of forest management that will restore and improve habitat which is an essential element in endangered species recovery.

Why Support: The Habitat Conservation Plan is built on a solid scientific foundation to address the long-term issues around endangered species and the restrictions imposed to minimize takings of listed species. The HCP also applies to a reasonable time span of 70 years. During the 70-yr life of the plan more stable and predictable timber harvests can be realized. Stability and predictability in any business or economic sector leads to better outcomes for employment, capital, business revenue and tax revenue. This is especially true for the small economies in rural Oregon. Implementation of the HCP, while designed to preserve and create habitat for 17 listed species, will improve conditions for many other animal, plant, and fungus species. The plan is a step toward building back an ecosystem that has, out of historic ignorance, resulted in a degraded forest with diminished natural resources that could be assets to local communities and residents of Oregon. Besides timber, water resources are an asset which includes in-stream habitat for a host of aquatic organisms, water supplies for human consumption, recreational opportunities, and irrigation for agriculture. Carbon-storage potential to help control the buildup of heat trapping carbon dioxide in the atmosphere can be increased in our State Forests by managing for older growth trees. HCP areas can show-case better management of our forests and serve as sites for ecological studies, educational opportunities and be an example for balancing the need for forest products with preserving endangered species and promoting an ecosystem that enhances species diversity.

Changing the Draft HCP now would delay implementation of a realistic, well researched, and beneficial plan, possibly by years. This plan has been in the making for about 5 years, it is past time for implementation. Species are nearing extinction, our planet is warming to a dangerous degree, and our water quality has been degraded for too long.

Concerns: Some local government officials express concerns over loss of revenue to the Common School Fund and special districts. However, the draft HCP shows only a small reduction in board feet of timber cut from State Forests over the 70-yr period compared to Alternative 5. It is important to educate those with economic concerns that benefits of more clean water supplies, improvement of recreational opportunities, and increases in native fish have economic benefits to local communities that are not quantified in the Draft HCP. These benefits will offset the slight reductions in revenue from timber sales. This reality is in keeping with the concept and agreement by counties and the State that State Forests are to be managed for the “greatest permanent value”, recently reaffirmed by the Oregon Supreme Court.

To the extent that it can be shown after a comprehensive economic analysis (expected in the revised FMP) there has been a verified reduction in revenue to the counties and CSF, the BOF should support the counties, working through the State Legislature, to make up that revenue loss from other sources.

Christopher Farrar
Director at Large, Clatsop Soil and Water Conservation District
Astoria Oregon

November 16, 2022

Oregon Board of Forestry
2600 State Street
Salem, Oregon 97310

Dear Board of Forestry,

I stand before you today to speak on behalf of some volunteers from across the state of Oregon. Presumptuous of me I know, but it is from the heart of volunteerism that my plea to you springs. As I have just this minute found out our testimony time has been reduced to sixty seconds let me say flat out I want you to choose Alternative 3 for the HCP and please find an alternative to funding our children's education from the already weakened back of the environment.

As I read your biographies I can see that you are a highly educated and experienced group with impressive resumes of work and service to natural resource extraction and conservation. As a retired carpenter I approach the issues around the HCP as what I like to think of as enlightened consumer though without degree or pedigree.

In answer to the State of Oregon's call, under the Kitzhaber administration, to form Watershed Councils I worked with others to create the Lower Nehalem Watershed Council in 1997. I chaired it through its early contentious years of stakeholder fear and loathing, created the first comprehensive estuary cleanup in Oregon's history and networked the protocols down coast, and in 2002 helped found the Lower Nehalem Community Trust a 501 3 c non-profit conservation organization. Both the watershed council and the trust continue to exist and do good work. For 20 years I have read and studied the Science Findings published by USDA Forest Service Department and have stuck with it long enough to say I can now honestly understand most of it.

For these many years I have asked people to join me in the cold wet to get on their knees and plant riparian zones, pull beer cans, pop bottles, shotgun shells, styrofoam and hundreds of tires from the estuary. Helped others fill out laborious OWEB, NRCS and USFW grant applications to find money to do the work for FREE. I am not here to pat myself on the back as I have accomplished nothing without the complicity and hard work of others who believe that the work we do for free, is the most important work we do.

Because this part of Oregon is dominated by private corporate forest owners our public lands and those saved by conservation organizations are our last chance to have actual forests, and not plantations subject to clear cut and run

tunnel vision economics. Everyone of you knows this to be true: The sustainability of Oregon, its beauty, its fish and all the other life forms that have sustained the soul of its peoples from the beginning of time will require the protection of habitats that provide for the greatest specie diversity. Knowing this I ask you on behalf of all those who still bend their knees to the task for a future, to do your job. As my friend Peter Hayes and I once ruminated, "who will grow the good wood?"

So here's our offer. 25 years for being heard for 60 seconds. I hope you heard us this time.

Thanks for the the opportunity,

Doug Firstbrook

Nobody special
Nehalem, Oregon

November 11, 2022

Oregon Board of Forestry
Oregon Department of Forestry
Salem Headquarters
2600 State St
Salem, OR 97310

Members of the Board of Forestry:

Thank you for representing the State of Oregon as a Board Member for the Oregon Department of Forestry. I am asking for your time today to consider more information and understand the importance of the decisions and the financial impact these decisions will have on current and future generations of students and districts that currently receive state funding via timber harvest revenue.

I was one of four Valedictorian graduates of the Neah-Kah-Nie (NKN) School District in 1997 and a recent MBA graduate of SOU in 2022. I experienced cuts due to Measure 5 and Measure 49-50, limiting the NKN school district to a permanent tax rate of \$4.5002 per \$1,000 of Assessed Value. While I was in school, all extracurricular activities became pay-to-play. My widowed mother, a wife of a 100% disabled veteran, gave us the funds to play. All construction trades and theatre programs were cut, and there was no social or emotional support during this time. At Neah-Kah-Nie, we now provide social and emotional support with on-staff counselors, an on-site medical clinic, and training to all staff to recognize students needing assistance. With this support, Neah-Kah-Nie School District has experienced growth during the pandemic and beyond. Neah-Kah-Nie was one of the few districts in Oregon to show growth, while most experienced a decline in test scores.

Timber revenue is an essential lifeline to the Neah-Kah-Nie School district and other school districts in Oregon. I testified before the Board on June 3, 2015, when I was a Union President for AFSCME Local 2734, representing employees of Tillamook County. My message is the same: "The decisions made by this Board will significantly impact the future of services in Tillamook County. On behalf of our members and the residents of Tillamook County, I encourage you to think carefully about the impact on small communities when forests are placed off limits from active management. The State forestland in Tillamook County was transferred to the State to be held and managed as trust lands for the benefit of its residents. It is troubling to hear that the forest management options being considered by the Oregon Board of Forestry may not provide sustainable revenue to cover the state costs of managing these forests – thereby increasing the possibility of the residents of Tillamook County as members of Oregon's Trust Counties may begin to lose essential services."

Neah-Kah-Nie School District does not receive Basic School Support, and any loss in state timber revenue directly impacts its annual budget. As proposed, adopting the Habitat Conservation Plan (HCP) and draft Environmental Impact Statement (EIS) will significantly impact NKN's ability to meet the needs of its students now and for the next 70 years. The lack of harvesting, county, and other district budget reduction will further impact the community. The impact of forestry harvesting on wages, especially secondary jobs, has not been adequately accounted for in the financial projections. One position in the forest equals numerous jobs in the mill, trucking, and the overall spending of income is spent locally. Forestry jobs are a win-win.

I am not against setting aside forestlands to protect water and the environment. I drive a hybrid car. As a property appraiser for 18 years with Tillamook County, I believe tax growth will not fill the revenue gap created by adopting the proposed plans and not even meet the needs of the Department of Forestry funding its essential programs besides fire prevention. I have observed that we can recreate and log simultaneously in our forest, especially in western Oregon. Recent studies have shown that some of the protected species are not facing a loss of habitat but competition from other species. Should we jeopardize our future students on a preliminary long-term plan?

Thank you for your time. I appreciate your taking the time to listen and spend time along the Coast. I look forward to meeting with you.

A handwritten signature in black ink, appearing to read "Kari Fleisher". The signature is fluid and cursive, with a large loop at the end.

Kari Fleisher

Vice Chair, Zone 3 Director

Neah-Kah-Nie School District

From: [Beth Genly](mailto:Beth.Genly@oregon.gov)
To: boardofforestry@oregon.gov
Subject: Comments for the November 17, 2022 BOF meeting re Habitat Conservation Plan for the Western Oregon State Forests
Date: Saturday, November 05, 2022 11:53:36 AM

Dear Chair Kelly, Ms. Agpaoa, Ms. Chambers, Mr. Deumling, Ms. Ferrari, Mr. Justice, and Ms. McComb,

Thank you for the opportunity to express both my appreciation and concerns regarding the proposed Habitat Conservation Plan for Oregon state forests. I am fully in support of your adoption of a strong HCP that will not only protect endangered species like the northern spotted owl and marbled murrelet but will also look to enhance habitat for those species.

The beautiful and diverse forests of Oregon are a crowning glory of our amazing state

I write today about the proposed Habitat Conservation Plan as a concerned citizen who also wants to see climate-smart forestry practiced by the Oregon Department of Forestry. Therefore, I was pleased to see that climate change was acknowledged in ODF's FAQ about the HCP.

In line with your acknowledgement of climate change, I endorse a focus for ODF to co-manage the Habitat Conservation areas not only for species protection, but also as carbon reserves. Our forests have been proven to be the best in the world on a per acre basis at drawing down (sequestering and storing) carbon. This carbon-storage property of our forests is an extremely valuable resource for our state, fully compatible with the HCP's goals of climate resilience, riparian protection, and species conservation.

It breaks my heart that drought and wildfires now threaten our forests every year. And I am an older person with health challenges who for weeks on end this year was once again breathing dangerous smoky air from warming-related wildfires. Therefore, I feel strongly that ODF must contribute to protecting our state – and indeed, our nation -- from further climate change by prioritizing carbon reserves as a primary goal of forest management. Therefore, I am delighted to read (in the FAQ) that you propose “working to identify the best available science” and to ensure that it is incorporated “when developing biological goals and objectives, conservation strategies, and the monitoring program.”

For all these reasons, I endorse the following climate-smart, science-based improvements to the HCP:

- Limit any timber harvest to areas of plantations within Habitat Conservation Areas for the purpose of promoting a more mature forest structure.
- Shorten the permit term from 50 (vs 70) years due to the uncertainties of increased climate change impacts.
- Rely primarily on natural forest regeneration following natural disturbances such as fire within HCAs to reduce harmful compaction and loss of live large trees.
- Increase steep slope logging protections as one of the many measures to better protect endangered species.

Thank you again for the opportunity to express my comments and concerns. I look forward to following the development of the final HCP.

Sincerely yours.

Elisabeth Genly,

Forest Grove, OR

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



Sent Via Email
boardofforestry@odf.oregon.gov

November 27, 2022

Oregon Board of Forestry
2600 State Street
Salem, Oregon 97310

RE: In Support of HCP

Dear Chair Kelly and Members of the Board of Forestry:

The Great Old Broads for Wilderness is a national organization with a mission to protect public lands, forest and wilderness; we also advocate for climate action. The Cascade-Volcanoes chapter has been involved in the Habitat Conservation Plan for Western Oregon State Forests (HCP), commenting on the draft HCP and the dEIS for the project. While we were unable to attend the Board of Forestry (BoF) meeting in Seaside on November 16th, we appreciate the opportunity to comment during the two weeks following the meeting.

We strongly support Alternative 3, the Conservation Alternative, with some changes from the draft HCP. The Conservation Alternative will provide the "greatest permanent value" of our state forests. Especially considering the changing climate, long-term protections for covered aquatic and terrestrial species require careful actions to protect watersheds and forests within the conservation areas.

We also request that the Board of Forestry include management of the Conservation areas—Habitat Conservation Areas (HCAs) and Riparian Conservation Areas (RCAs)—as Carbon Reserves, consistent with the primary purpose to protect and recover the threatened and endangered species covered by the HCP. This can be a primary implementation of the Climate Change and Carbon Plan (CCCP), approved by the BoF on 11/3/2021. If the Conservation areas are managed for carbon storage and carbon sequestration, there will be less impact on production stands to meet the goals of the CCCP. Carbon strategies could include minimizing thinning within conservation areas, balancing carbon storage with other goals, and no post-fire logging in the reserves, should the areas burn.

We learned that there was a motion for the Board of Forestry to support Alternative 5, expanded harvests, at the meeting, which was rejected by a 4-3 vote of the Board. We are gratified that the majority of the Board supports an HCP that is more protective of threatened and endangered species.

The Great Old Broads for Wilderness appreciates the commitment of the Board of Forestry to manage our state forests for the greatest permanent value for all Oregonians.

Sincerely,

A handwritten signature in cursive script that reads "Darlene Chirman".

Darlene Chirman
Leadership Team
Cascade-Volcanoes Chapter
Great Old Broads for Wilderness

From: [Jennifer Hamaker](#)
To: [KELLY Jim * ODF](#); [OLIVOS-ROOD Hilary * ODF](#); [KOLOMECHUK Cindy * ODF](#); [COX Jason R * ODF](#); [MUKUMOTO Cal T * ODF](#); [AGPAOA Liz * ODF](#); [CHAMBERS Karla S * ODF](#); [DEUMLING Ben * ODF](#); [FERRARI Chandra * ODF](#); [JUSTICE Joe * ODF](#); [MCCOMB Brenda * ODF](#)
Cc: [David Yamamoto](#); [MAIN Robert](#); [John Sweet](#); [Tim Freeman](#); [NYQUIST Roger](#); [POPE Craig](#); [Courtney Bangs](#); [Bob Zybach](#); [Tasha Webb](#); [Jeffery Leavy](#); [Comissioner Court Boice](#); [Genetechs](#); [STANDLEY JR Mark](#); [Laura Wilkeson](#); [Astor Amanda](#); [DUNCAN Sara](#); [Peter Gibney](#)
Subject: Proof NOT Promises!
Date: Sunday, November 06, 2022 10:09:20 AM

Why do we keep paying for studies when, 1. the results do not affect your decisions and 2. that money should be spent on producing species, not just studying them. I would like to see results, not just keep paying for them!

What evidence, other than projections from computer models, prove that HCPs have had any positive effect on targeted spotted owl, marbled murrelet, or coho populations in western Oregon over the past 35 years?

There is documented proof that the adoption of passive approaches to forest management greatly increases accumulations of ground fuels, ladder fuels, and canopy closures, and thereby lead to greater likelihoods of deadly major- and catastrophic-scale wildfires.

Attempts to affect targeted wildlife species by creating Wilderness Areas, Riparian Reserves, LSRs, HCPs and computerized "critical habitat" models in western Oregon during the past 35 years have been at a great cost of billions of dollars, tens of thousands of lost rural jobs, hundreds of thousands of burned forest acreages, thousands of lost homes, millions of killed wildlife, extended episodes of major air and water pollution, and losses of human life.

What evidence is there proving that these massive investments have resulted in a single additional owl, murrelet, or salmon?

The attached studies show that Coho populations are increasing and they state that increasing populations are more impacted by ocean conditions than waterways. Tillamook and Coos County's have the states strongest Coho runs, so much so that ODFW authorized fishing permits to catch them, yet ODF is using the Coho as a protected species under the Endangered Species Act (ESA) to impose an Habitat Conservation Plan (HCP) on 640,000 acres of state land, a large portion being in Tillamook and Coos county's. This makes no sense. Populations are increasing BEFORE this HCP!

Interesting that the National Marine Fisheries Service's (NMFS) status review indicates low species viability of the Umpqua Stratum of the Oregon

Coast Coho ESU, and the need for improvements to the South-, North-, and Middle-Umpqua populations, areas that have been hard-hit by wildfires, before that Stratum can be considered viable under the ESA. The HCP that is supposed to protect Coho, will create more unmanaged timberland which increases the risk and severity of wildfire yet they won't delist the Coho because of low species viability in wildfire risk areas? This is double talk and perpetuates the same results. Let's get results, not keep paying for them and pretending by doing the same thing again and again will someday work!

Also, the Red Tree Vole is being used as a species on the ESA to impose the HCP even though USFWS found this species did not warrant being listed on the ESA.

FWS Withdraws "Non-Warranted" Finding for the Red Tree Vole

*On October 19, FWS issued a notice that it will withdraw its December 19, 2019 "not warranted" finding for the red tree vole north Oregon coast district population segment (DPS) (*Arborimus longicaudus*), returning the species to the FWS's candidate species list.*

See 87 Fed. Reg. 63472 (Oct. 19, 2022). FWS is also initiating a new status review for the north Oregon coast DPS to determine whether it meets the definition of endangered or threatened under the ESA and is requesting new information on the DPS's distribution and abundance, its habitat, conservation efforts

undertaken, and threats to it for consideration in a new 12- month ESA listing finding.

The withdrawal notice is the result of a settlement agreement. In March 2021, environmental groups challenged FWS's determination that the north Oregon Coast DPS did not warrant listing under the ESA. See August 2021 Newsletter. AFRC and the Oregon Forest & Industries Council moved to intervene, but the intervention request was denied. Shortly thereafter, and in the middle of summary judgment briefing, the parties stayed the case to pursue settlement. On April 15, the parties reached a settlement agreement whereby FWS agreed to reconsider its not warranted finding and develop a new 12-month finding as to whether the DPS warrants listings by January 31, 2024. See April 2022 Newsletter. The court approved the settlement agreement on May 23.

FWS is now seeking the following new information pertaining to the north Oregon coast DPS: (1) Distribution, ecology, and life history of the DPS, including habitat needs and requirements for reproduction, growth,

nutrition, and dispersal; (2) Positive and negative survey information on the DPS; (3) Potential stressors to the DPS or its habitat, including the threat of catastrophic wildfire; (4) Ongoing and planned activities or projects in the areas occupied by the DPS, and possible impacts of these activities on the DPS; (5) Whether there are any areas outside the area currently known to be occupied by the DPS that may be important to its conservation; and (6) Past, current, and future conservation actions or management practices that may benefit the DPS or its habitat. Comments are due November 18. /Sarah Melton

ODF is applying for a 70 year Incidental Take Permit (ITP) from USFW and NOAA Fisheries for species that should be delisted.

Come on Board of Forestry, ODF and State Forester Cal Mukumoto, you can do better and get better results!

Genuinely concerned,
Jen Hamaker
Oregon Natural Resource Industries
805-245-2612

ODFW Studies

<https://www.dfw.state.or.us/fish/ONFSR/docs/final/01-coho/coho-summary.pdf>

<https://www.dfw.state.or.us/fish/ONFSR/docs/final/06-winter-steelhead/ws-summary.pdf>

COurt Case regarding Red Tree Vole

https://www.courthousenews.com/wp-content/uploads/2021/03/Red_Tree_Vole_complaint_3-25-21.pdf

Endangered and Threatened Wildlife and Plants; Withdrawal of the NotWarranted Finding for Endangered or Threatened Status for the North Oregon Coast Distinct Population Segment of Red Tree Vole

AGENCY: Fish and Wildlife Service, Interior.

ACTION: Notification of withdrawal of petition finding and initiation of status review

<https://www.govinfo.gov/content/pkg/FR-2022-10-19/pdf/2022-22642.pdf>

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NOTICE: It is okay to print this email. Paper is a plentiful, biodegradable, renewable, recyclable, sustainable product made from trees that supports our economy by providing jobs and income for millions of Americans. Thanks to improved forest management, we have more trees in America today than we had 100 years ago.

From: [Emily Herbert](#)
To: boardofforestry@oregon.gov
Subject: Comments for the November 17, 2022 BOF meeting re Habitat Conservation Plan for the Western Oregon State Forests
Date: Monday, November 07, 2022 8:02:38 AM

Dear Oregon Board of Forestry,

As a Forest Service "brat" now octogenarian, I have always held the well being of forests as essential for life and embraced the "multiple" values perspective for forest management. We are on the brink of a climate warming catastrophe. The essential nature of cooling forests for preservation of fish, clean water, species survival and migration and sequestration of carbon is greatly heightened.

Oregon Western slope forests are uniquely capable of assistance in recovery because of their capacity to store carbon in the soil over long periods of time. I'm urging all my contacts to view "Fabulous Fungi" which clarifies the interdependent nature of what is happening above and below ground with trees playing a major role storing carbon in the soil.

I greatly appreciate your holistic, proactive landscape-scale approach designed to ensure protection of federally-listed threatened and endangered species. As nature is of a whole, a piecemeal approach cannot work. And your commitment to using the best science is commended.

Protecting mature and old growth trees is essential, with judicious thinning so that trees are grown longer. Diversity in species, ages and structures is predictive of success over monocultures. Yeah for resilience and flexibility going forward!

Thank you for the opportunity to comment on the Habitat Conservation Plan, and I deeply appreciate your service to the forests of Oregon as they are essential to the continuation of the Oregon we all love.

Emily Herbert

Portland, OR

Chair Kelly and Members of the Board of Forestry,

My name is Felice Kelly and I am a trail runner and angler who recreates in the state forests. In addition I am a volunteer with the climate justice organization 350PDX. I am writing today to follow up on the comments that I gave by video at the Board meeting on Nov 16th. Thank you for the opportunity to provide public comment.

We are in a climate crisis driven by the release of CO₂ and other greenhouse gases, such as methane, into the atmosphere through land use, livestock production, and the burning of fossil fuels. The climate crisis is hastening the sixth great extinction by increasing the temperature of earth's land and water. This has a profound effect on salmon species that are addressed by the proposed HCP for Western State Forests.

Preserving high carbon priority forests avoids future CO₂ emissions from harvest and mitigates existing emissions through continued carbon sequestration. Oregon's temperate forests have the capacity to be one of the world's best carbon stores on a per-acre basis. Enacting Alternative 3 of the HCP will preserve ~50% of the western state forests as high quality habitat for endangered species and as carbon stores for the next 70 years. This is the right choice to ensure the greatest permanent value.

Board member Chambers asked the members of the public commenting on the HCP to consider the economics of the plan. In response I would like to ask the Board to ensure that those economic considerations include the externalities of climate change. As 350PDX laid out in our comments on the draft EIS, the economic analyses of the HCP alternatives does not seriously consider the social cost of carbon, which is currently estimated between \$15 and \$78 per metric ton of CO₂, though may be much higher. These are real societal costs that will be paid, in part, by the state of Oregon as the costs of climate change increase, but are not considered as part of the economics of the various HCP alternatives.

Thank you for considering these comments, and for your service on the Board of Forestry.

Sincerely,
Felice Kelly, Ph.D.
Portland, OR

To: Board of Forestry

Submitted via email: boardofforestry@oregon.gov

Re: Comments for the November 17, 2022 BOF meeting re: Habitat Conservation Plan for the Western Oregon State Forests

Thank you for the opportunity to share these comments and perspectives on the Habitat Conservation Plan and to recognize ODF's ongoing work towards a sustainable environment.

The plan has identified a number of critically important areas of interest for myself, family and as importantly, concerned constituents throughout Union County and Oregon. Interests both current and generational who appreciate deeply their role and that of the Department of Forestry towards recognizing and responding to environmentally sensitive species and our forests.

While strongly supporting the overall commitments to environment and species outlined in the plan, and especially to the emphasis on conserving forest carbon sinks. One of the most cost-effective and essential near-term climate solutions Oregon can deploy to conserve and expand these sinks and to protecting plant and animal species is to establish durable protections for mature forests and trees on state lands from the threat of logging.

The board clearly recognized this need when drafting its plan to protect mature and old-growth forests, establishing the critical correlations of importance that Nature Based Solutions can and do have in the fight against climate change and inherent and correlative impacts on plant and animal species.

Now, as the board meets with stakeholders and the public to chart a course for confronting climate change, we must ensure the potential to implement nature-based solutions that are fully realized.

It is no longer guess work as to our largest trees holding the greatest amount of carbon and the need to be protected. Protecting both mature trees and old growth on states lands from the threat of logging is one of the best mechanisms to ensure these sinks and stores are protected while protecting the soils that also hold vast amounts of carbon. Contrary to popular belief, intact multi-story mature and old growth forests and their soils are the best technology to sequester and store carbon while best withstanding the increasing wildfire threats. In addition, forest conservation provides co-benefits including safeguarding watersheds for communities across the state, preserving critical habitat and preventing further loss of biodiversity, and even public health benefits for all Oregonians through increased outdoor recreation opportunities.

We fully support President Biden's calls for bolstering forest protections globally. And, we can lead by example by establishing durable rules that protects mature and old-growth forests and trees on state lands from logging.

In addition, with the passage of the Infrastructure Investment and Jobs Act (IIJA) and Inflation Reduction Act (IRA), we are well-positioned to fund new and innovative actions to mitigate climate change through states plans such as modeled by ODF, but that must be paired with measures at the state level that preserve our natural climate solutions. The IRA included billions of dollars for forest management, on

top of the billions allocated by last year's Infrastructure Investment and Jobs Act. Establishing clear regulations protecting mature forests and trees from logging is a key first step at the federal level to preserve carbon stores - and reduce conflict and controversy - as that funding is implemented. The state Board of Forestry is now well equipped to become a leader in these efforts to prevent significant loss of life whether human or animal due to climate related forest fires, protect and critical habitat and preserve Oregon's natural and lived environments.

In closing, it is my fervent hope that the Board will consider the following in its considerations.

- Limit future timber harvesting to areas of plantations within Habitat Conservation Areas for purposes of promoting a more mature forest infrastructure,
- Shorten permit terms from 50 (vs 70) years due to uncertainties of increased climate change impacts,
- Reliance to be primarily on natural forest regeneration following natural disturbances such as fire within HCAs to reduce harmful compaction and loss of live large trees, and
- Increase steep slope logging protections as one of many measures to better protect endangered species and water resources.

Thank you for your ongoing leadership to address climate change for the existential crisis it is and emphasizing the power of nature as a major solution.

Respectfully,

Randy L Knop

Turcotte Consulting, Inc.

P.O. Box 738

Union, Oregon 97883

(541) 562-6289

rknop@eoni.com

Chair Kelly, Members of the Board of Forestry
I appreciate this opportunity to submit comments.

My name is Josie Koehne and I am a small forest owner.
I support the **State HCP Alternatives, 2&3 but preferably 3.**

The HCP is a balanced approach that should satisfy the federal requirement of **protecting endangered species** while permitting timber harvests on about half of ODF-managed lands. The recent EIS report-tables indicate that alternatives 3 will provide the most benefits for the criteria modeled.

The ACA maps allow for better planning for operations and surer revenue expectations for both ODF and the counties, and additional logging outside the ACAs **for tree health**. If approved, the accidental take permit will provide legal assurance for the timber industry. Since species **survey-maps** are eliminated on timber sales, there will be faster time-to-market to capture strong prices. This also frees up ODF resources for monitoring and adaptive management projects.

That said, I would like to endorse Bob Van Dyke's, Candace Bonner's and others' comments about decoupling county financing from timber sales on state land. The general fund could augment county financing, and support diversification of rural economies. But I also want to support Catherine Sullivan, Chuck Willer's comments and OPB research that the commercial timber industry has reduced its taxes drastically since the 90s that used to fund county services. I think there is away to capture REIT and TIMO profits through the tax code. Our tax code needs to reward climate smarter forestry practices as Peter Hayes will address later today.

The HCP lives up to ODF's **obligation** to manage for **Greatest Permanent Value** now and into the future.

I sent in comments in support of the Private Forest Accord and the rules developed so far.

Thank you for the opportunity to share these comments.

From: [Linda Kubes](#)
To: boardofforestry@oregon.gov
Subject: Re: Comments for the November 17, 2022 BOF meeting re HCP for Oregon State Forests
Date: Sunday, November 06, 2022 8:17:14 AM

Dear Chair Kelly, Ms. Agpaoa, Ms. Chambers, Mr. Deumling, Ms. Ferrari, Mr. Justice, and Ms. McComb,

Good day panel,

As a concerned citizen I too want to express my concerns and appreciation for the efforts on the proposed Habitat Conservation Plan. I completely support adopting a strong HCP that will help protect all our precious species, with focus on endangered species, and addressing carbon reserves. It is extremely important to express the need to preserve these carbon-storage assets of our forests within the HCP's goals. As fires become more emmint we need ODF protection, fires like we have had contributed too many concerns to list but not limited to human health and biodiversity.

I indorse the following improvements to the HCP:

Limit any timber harvest to areas of plantations within Habitat Conservation Areas for the purpose of promoting a more mature forest structure.

- Limit any timber harvest to areas of plantations within Habitat Conservation Areas for the purpose of promoting a more mature forest structure.
- Shorten the permit term from 50 (vs 70) years due to the uncertainties of increased climate change impacts.
- Rely primarily on natural forest regeneration following natural disturbances such as fire within HCAs to reduce harmful compaction and loss of live large trees.
- Increase steep slope logging protections as one of the many measures to better protect endangered species.

Thank you again for the opportunity to express my comments and concerns. I look forward to following the development of the final HCP.

In solidarity,
Linda Renee Kubes
Gladstone, Oregon

Oregon Board of Forestry Testimony

November 16, 2022

Thank you to the Oregon Board of Forestry for the opportunity to speak to this very important issue. My name is Arline LaMear. I had the honor of serving as Mayor of Astoria from 2015-2018. I am also Chief Guide of the Angora Hiking Club which was formed in 1920 and has supported and advocated for recreational use of Oregon's state forests ever since – over 100 years! I am here to support a strong Habitat Conservation Plan for Western Oregon State Forests. This plan must be grounded in science and must protect fish and wildlife for the benefit of **all** Oregonians. I would urge you to adopt HCP Alternative 3, the strongest and most comprehensive of the three options for the Habitat Conservation Plan.

As a resident of Astoria since 1997, I have watched as numbers of Oregon coastal coho, wild fall Chinook, and steelhead have trended steadily downward affecting the entire fishing community – commercial, sport, and our native tribes. We need to do everything in our power to protect these species which have been important since time immemorial. Science has shown the increased benefits to fish, wildlife, clean water and mitigation of the harmful effects of climate change by keeping trees on the landscape. Clean water is sometimes thought of as a given, but it's a resource we must protect. Rain that does not soak into the ground becomes runoff and carries soil, pollutants, and other materials from the land into our rivers, lakes and bays. Our watershed depends on trees to absorb the torrential rains that cause landslides and sediment to enter salmon spawning beds.

I also believe in the importance of decoupling timber harvests from funding for rural counties. As Mayor, City Councilor, and engaged citizen, I've witnessed again and again the challenges rural Oregon faces when county budgets for schools, public safety and more are dependent upon revenues generated from timber harvested on public lands. Volatile timber prices make budgeting difficult at best. We need to work together to find a stable way to fund our counties without sacrificing our state forests.

Again, I care deeply about this issue. My dad was a cartographer for the U.S. Geological Survey. He mapped in a lot of the Western forests. I grew up loving to hike and that love continues to this day. I also feel deep concern for the impacts of climate change and clean water here in rural Oregon and across the nation at large. Managing forests for multiple use – including keeping trees on the land for habitat and carbon sequestration has never been more important. Fish are forest products, too. And forest recreation, hunting, and sportfishing tourism provide important sustainable forms of income for our communities. I hope you will adopt an enhanced Conservation Alternative that advances a better path for these species, their habitat, and broad conservation values on state-managed public forest that will benefit current and future generations.

Thank you for the opportunity to provide public comment today.

Arline LaMear
288 Franklin Ave.
Astoria, OR 97103
503-338-6883
cliffandarline@msn.com



Sent Via Email

November 11, 2022

Oregon Board of Forestry
2600 State Street
Salem, Oregon 97310

Dear Chair Kelly and Members of the Board of Forestry:

The undersigned groups are writing to share our perspectives on the continuing challenge of finding the right balance on state forest management. As you know, balancing values on state forests has been difficult and controversial. However, the recent resolution of the Linn County litigation has provided some clarity. Now that it is established that the Board of Forestry has broad discretion to manage our state forests for all Oregonians, and not just taxing districts, we have an opportunity for a broader conversation on the path forward. We believe the Board should adopt a strong Habitat Conservation Plan (HCP) and renew efforts to identify solutions that provide more stability to both taxing districts and the state forest program budget.

We continue to strongly support your work on a Habitat Conservation Plan for Western Oregon State Forests, and we thank you for your commitment to managing Oregon's state forests for the benefit of all Oregonians. We ask that you support an HCP that is at least as protective as Alternative 3, the conservation alternative. Alternative 3 would best ensure the "greatest permanent value" of our state forests by providing necessary long-term protections for fish and wildlife, meeting the challenges posed by climate change, and allowing for ongoing timber harvest. The Habitat Conservation Areas and Riparian Conservation Areas would not only serve the purpose of protecting habitat for threatened and endangered species, but also act as carbon reserves and aid in the implementation of the Climate Change and Forest Carbon Plan.

In order to achieve more stability in state forest management, we strongly encourage you to focus attention on the need for systemic changes to ODF's funding and business model. With the Linn County lawsuit behind you, there is an opportunity for all sides to come together and identify solutions that ensure sustainable funding for local taxing districts while at the same time protecting fish and wildlife habitat and recreation values for Oregon's state forests. This effort will require investment by the General Fund, and we are prepared to support work exploring those outcomes.

The Private Forest Accord is proof that the timber industry, landowners and the conservation community can work together to find solutions. We support solutions that would allow our state forests to be managed for multiple benefits, respond to the stresses of climate change, and identify stable funding sources for necessary local services.

Thank you for your commitment to managing our state forests for the greatest permanent value for all Oregonians.

Sincerely,

Brenna Bell
Forest Climate Manager
350PDX

Jason Wedemeyer
Executive Director
Association of Northwest Steelheaders

Steve Griffiths
Joseph Youren
Directors
Audubon Society of Lincoln City

Bob Sallinger
Conservation Director
Audubon Society of Portland

Lisa Arkin
Executive Director
Beyond Toxics

Grace Brahler
Wildlands Director
Cascadia Wildlands

Noah Greenwald, M.S.
Endangered Species Director
Center for Biological Diversity

Darlene Chirman
Leadership Team
Great Old Broads for Wilderness
Cascade Volcanoes Chapter

Bob Rees
Executive Director
NW Guides and Anglers Association

Mark Rogers
Chair
Oregon Council of Trout Unlimited

Julia DeGraw
Coalition Director
Oregon League of Conservation Voters

Lauren Anderson
Climate Forest Program Manager
Oregon Wild

David Harrison
Conservation Chair
Salem Audubon Society

Victoria Frankeny
Staff Attorney
Tualatin Riverkeepers

Michael Lang
Oregon Senior Policy Manager
Wild Salmon Center



The League of Women Voters of Oregon is a 102-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.

Nov. 16, 2022

To: Oregon Board of Forestry
Jim Kelly, Chair
Members of the Board

Email: boardofforestry@odf.oregon.gov

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

Re: Agenda Item 6: Habitat Conservation Plan Alternatives 2&3– **Support**

The League of Women Voters of Oregon Supports Alternatives 2 & 3 of the Western Oregon State Forests Habitat Conservation Plan.

The League of Women Voters of Oregon supports Oregon’s statewide land use planning program. Specifically, we support Goal 4 that promotes the management of forest lands for both economic development and their value as natural resources. We believe that 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, implemented by local and regional governments. Full accounting of all costs, including cumulative ecological impacts, of timber harvests and other forest uses must be considered in forest activity decisions.

We support both the tenets and the recently approved rules of the Private Forest Accord and believe that the second and third alternatives of [The Western Oregon State Forests Habitat Conservation Plan \(HCP\)](#) best represent the intent of the negotiations and the purpose of an HCP in protecting endangered species as required by federal law. As part of the National Environmental Policy Act (NEPA) process, an [Environmental Impact Statement \(EIS\)](#) is required. Five versions of the HCP were modeled and analyzed for their environmental impact in 12 topic areas ranging from impacts on soils, water, and wildlife to socioeconomic, environmental justice and carbon storage impacts. We believe that Alternatives 2 and 3 will accomplish the best outcomes for most Oregonians, including those who rely on timber production.

The LWVOR recently adopted [positions on forestry](#) stating “...all benefits of the forests—ecological, human and economic—are inextricably interconnected. Healthy forests are essential to habitat for a diversity of plant and animal life, to the hydrologic cycle, and to carbon storage to mitigate global warming. In addition, healthy forests are essential to a forest products industry with the jobs and goods they provide, and to the economic and aesthetic values of their recreational opportunities.” Additionally, we believe that “Riparian zones are an integral part of the forest ecosystem and must be regulated adequately to protect the streams and the wildlife dependent upon the streams.” Also, we appreciated that the HCP development process allowed for ample public input and engagement in all of the HCP alternative plans.

The Habitat Conservation Plan (HCP) presents a balanced approach to satisfying the federal requirement for protecting endangered species while permitting timber harvests on ODF-managed lands. The reasons we support the plan are:

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 will be 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 or additional endangered species in the future.
- Financial stability for counties dependent on timber revenues with better volume and revenues than the current Western Forest Management Plan (FMP).
- The comparative analysis points to more land permitted for future timber harvests going forward in the Habitat Conservation Areas (HCAs) than the current plan.
- Streamlined timber sale process to improve time to market and capture high market prices.
- New tax credit provisions and an agency office responsive to small forest owners to partially compensate them for timber sale losses due to new stream buffer requirements.

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

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 land 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
- Additional carbon sequestration to mitigate CO2 emissions as a bonus
- Helps with cleaner drinking water resources, improved soils and reduced algae blooms.

The plan lives up to ODF's obligation to manage for Greatest Permanent Value for all Oregonians. The EIS report provides tables comparing the plan alternatives, and we conclude that Alternatives 2 and 3 will provide the best outcomes and overall benefits to most Oregonians as we face future climate conditions.

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



Rebecca Gladstone
LWVOR President



Peggy Lynch
LWVOR Natural Resources Coordinator



To: Oregon Board of Forestry

Submitted via email: boardofforestry@oregon.gov

Re: Comments for the November 16, 2022 meeting re Habitat Conservation Plan for the Western Oregon State Forests

Thank you very much for the opportunity to testify on the Habitat Conservation Plan. We support all the work you are doing to establish a strong Habitat Conservation Plan that will provide increasing, and I quote, “certainty for long-term persistence of covered wildlife species by protecting and maintaining high-quality habitats,” and also, quote “conducting habitat enhancement activities in areas of lower quality habitat.”

We know that climate smart forestry really has a strong application here where protecting mature and old growth trees and ensuring a diversity of species, ages and structures is key. We also appreciate the fact that you state that climate change is the lens through which you view the ecological future and that you will develop a forest that is resilient. Given the fact that our forests are the best in the world on a per acre basis for drawing down carbon we ask that you co-manage HCA’s and RCA’s for protection and recovery of endangered species as well carbon reserves.

We believe that Alternative 3 has much to offer the Board as this option is the one most likely to help in the recovery of the species. In addition, we suggest some additional considerations:

- Engage in management practices that will promote a more mature forest structure,
- Shorten the permit term from 70 to 50 years given how much uncertainty there is in the future with climate change,
- Rely primarily on natural forest regeneration following any natural disturbance, and
- Increase steep slope protections which will help better protect endangered species.

Sincerely,

Rand Schenck
Forestry Lead, Metro Climate Action Team

**Board of Forestry Hybrid Meeting | Online testimony re item #1 (HCP)
Nov. 16, 2022**

Good morning, Chair Kelly and members of the Board. Thank you for the opportunity to speak today.

My name is Bonnie New, and I am participating online from Hood River County.

For the reasons outlined in the HCP process and in earlier testimony today, **I support** adopting a strong habitat conservation plan, weighing fish and wildlife, recreation, and watershed considerations among the critical benefits that a forest policy must address.

I support and advocate for implementing an HCP that is at least as protective as alternative 3, and I specifically wish to speak against alternative 5 which would hurt the Mt. Hood watersheds by allowing more logging in conservation areas. More on that below.

In Hood River County the issue of providing more income certainty for the county is critical. Like other forest counties, we are experiencing significant negative impacts from unpredictable timber revenue. Many critical education and public services in our county are suffering from financial impacts, and need to be stabilized.

Also here in Hood River County, watershed effects from logging in and near riparian areas are dramatic and adverse. Riparian areas need robust protection from nearby logging. Already the shade coverage of streams that's needed to maintain cold water temperatures has been damaged by inadequate buffers here. Same with water quality degradation from silting. These two factors are adversely affecting both fish viability and spawning success in our watersheds, which of course hurt both our recreational and subsistence fishing.

A less obvious but critical long-term effect is that the forests themselves are being degraded, slowly starved of nutrients that feed upstream wildlife, the soils, and the trees themselves. Impairing the cycle of return of nutrients from anadromous fish in the watershed is bad for all of us connected to Oregon forests.



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November 7, 2022

Chair Jim Kelly and Members of the Board of Forestry
2600 State Street
Salem, Oregon 97310

Dear Chair Kelly and Members of the Board,

The Forest Team of the Oregon Chapter of the Sierra Club thanks you for your leadership of the Oregon Department of Forestry (ODF) and for taking on the responsibility to manage our state forests for the benefit of all. Our state forests in Oregon need a strong Habitat Conservation Plan (HCP). While we acknowledge that some county commissioners claim the Oregon Department of Fish and Wildlife (ODFW) and Department of Environmental Quality (DEQ) do not have a statutory role to advise ODF on the management of state forest lands and should not give support to an HCP, we strongly disagree. The Oregon Court of Appeals ruled in April of this year that the Department of Forestry has the statutory discretion to manage state forests for multiple values, including clean water, wildlife habitat and recreation—not just for maximizing timber harvests. This ruling rejected the claim by Linn County that language in the Forest Acquisition Act of 1941 constituted a contract between the state and the counties to maximize revenues from timber harvests.

The process for establishing an HCP has been well thought out, has been open to the public and the many stakeholders, and has carefully gone through phases one and two. For two years, Federal scientists have worked closely with ODF to design the conservation locations within the HCP. The HCP will enable ODF to make long-term plans and investments.

We urge you to adopt an enhanced Conservation Alternative 3 that will promote movement toward an ecological model of forestry (see the Oregon Chapter Sierra Club Forest Team's [letter to the Board of Forestry](#) dated 9/12/22). While even greater protections are warranted, HCP Alternative 3, the Conservation Alternative, will add approximately 11,000 acres to stream buffers, 15,000 for the Northern Spotted Owl and Marbled Murrelet, and an additional 20,000 acres for new species listing. It will protect key fish streams, especially the Trask, Wilson Kilchis, and Salmonberry, home for coho, fall chinook, and winter steelhead. Some critics may not prefer those additions, but such an HCP can reduce average annual Environmental Species Act (ESA) compliance costs by an estimated 2.2 million dollars (see p.45 of ODF's [HCP Business Case Analysis](#)). Take prohibitions defined in Section 9, ESA, are strict, and parties

can sue for non-compliance. At the same time, an HCP will provide regulatory assurances, allowing ODF to increase the predictability of its costs related to listed species. The ODF's burden for annual survey and monitoring costs will be greatly reduced.

An enhanced Conservation Alternative for an HCP is in keeping with management of Oregon's forests for the "Greatest Permanent Value," providing social and environmental benefits, as well as economic benefits, to the people of Oregon. No longer can we maximize timber revenue while sacrificing habitat conservation, water quality protection, climate resilience, and the few remaining older-aged stands of timber in our state forests.

Respectfully,

Carol Valentine

Carol Valentine
Forest Team Coordinator
Oregon Chapter Sierra Club

November 16, 2022

Oregon Board of Forestry
2600 State Street
Salem, Oregon 97310

Salem, OR

Dear Chair Kelly and Members of the Board:

We wish to express our gratitude for the direction you have given to the Oregon Department of Forestry in drafting the **Western Oregon State Forest Habitat Conservation Plan**. Ever since the Oregon Plan for salmon and watersheds was drafted nearly a quarter century ago, there has not been a comprehensive plan to recover other species of concern that reside on our state forest lands.

Since the time Oregon coastal coho were listed under the Endangered Species Act (“ESA”), other species, both economically and ecologically important, have been driven to dangerously low levels, further compromising the chance for recovery. This year, the take of wild fall Chinook was closed in the entire Tillamook Basin, due to depressed numbers of adults returning to the watershed. These closures in the Tillamook and constraining opportunities in other north coast watersheds severely compromised a \$200 million dollar a year industry that depends on abundant fish and wildlife in Tillamook and Clatsop Counties. In the last two decades, we’ve never witnessed so little opportunity to pursue salmon on the North Coast, it’s an indication that we have a critical problem.

The North Coast’s wild salmon and steelhead are a forest product too, a product that seems to be disappearing off of the land and waterscape. We believe the Habitat Conservation Plan will address the needs of these fish, and give them a chance to recover, along with the North Coast recreation economy.

It is for this reason, we believe the board and agency should seek the maximum protections modeled under **Alternative 3** providing “**increased conservation**” for species of concern. Long gone are the 40, 50 and 60-pound Chinook the Tillamook State Forest used to produce, and in many cases, we’re failing to meet minimum spawning escapement goals for several runs of wild salmon.

Furthermore, it’s time we look at the business model for harvesting timber off of our public lands. For all too long, the budgets of rural Oregon have been tied to the amount of timber harvested off of these lands. While historically this has been good for the counties, science is showing the increased benefits to fish, wildlife, clean water and mitigating the harmful effect of climate change for keeping trees on the landscape. It’s time we examine another model that keeps counties whole, while enabling this beneficial natural resource to perform the ecological benefits that they evolved to produce.

Given the relatively young age of the stands that currently exist on the North Coast, we’ve lost the many benefits older-aged trees produce for our ecosystems. Mature riparian areas, tree/stream recruitment in the steep-sloped watersheds of the basin and the ability for the watershed to absorb the torrential rains that cause landslides and sediment on the spawning beds are just some of these benefits.

Decoupling the timber harvest/county funding relationship would be a win-win for Oregonians. It would provide more stable funding for county services in times of volatile timber prices and fulfill the true obligation of Oregon to manage these public lands for a multitude of uses; economically, ecologically and socially.

Adopting the HCP and developing a decoupling strategy for Oregon's public lands is bold and necessary. As the needs of Oregonians change, so must our strategies to meet those needs.

Thank you for your service to the state of Oregon, we urge you to move forward with **Alternative 3** for the Western Oregon State Forest Habitat Conservation Plan and a strategy that alleviates rural Oregonian's budgets based on the amount of timber harvested from public lands.

In Gratitude,

Bob Rees, professional fishing guide, Bay City, Oregon

Chris Vertopoulos, professional fishing guide, Portland, Oregon

Michael O' Leary, outdoor recreation, Portland, Oregon

Michelle Bright, sport angler, Astoria, Oregon

Connor Allison, sport angler, Hillsboro, Oregon

Nate Zeiler, sport angler, Winnemucca, Nevada

Tom Buckingham, sport angler, Beaverton, Oregon

Ed Wright, sport angler, Milwaukie, Oregon

Ethan Stenerson, sport angler, Hillsboro, Oregon

Eri Stenerson, sport angler, Hillsboro, Oregon

Victoria Stenerson, sport angler, Hillsboro, Oregon

Rod Cook, sport angler, Newberg, Oregon

Lee Henson, sport angler, Vancouver, WA

Alden Kasiewicz, sport angler, Portland, Oregon

Kenny Wikler, sport angler, Lake Oswego, Oregon

Charlie Ciecko, sport angler, Gresham, Oregon

James Ferkell III, sport angler, Salem, Oregon

James Ferkel Jr. sport angler, Salem, Oregon

Tyler Van Brunt, sport angler, Portland, Oregon

Ron Brown, sport angler, Gresham, Oregon

Ron Bell, sport angler, Newberg, Oregon

David Nickerson, sport angler, Sherwood, Oregon

David Shuldes, sport angler, Oceanside, Oregon

Vaden Green, sport angler, Gresham, Oregon

Matt David, sport angler, Canby, Oregon

Thomas Sheridan, sport angler, Newberg, Oregon
Cameron Hyde, sport angler, Hillsboro, Oregon
Kevin Potter, sport angler, Portland, Oregon
Royal Johnson, sport angler, Portland, Oregon
Tom Hinkle, sport angler, Lake Oswego, Oregon
Chad Harbeck, sport angler, Hillsboro, Oregon
Frank Halstead, sport angler, Roseburg, Oregon
Jon Vanderfleet, sport angler, Milwaukie, Oregon
Don Schmidt, sport angler, Aurora, Oregon
Rich Mcleod, sport angler, Astoria, Oregon
Dave Robbins, sport angler, Beaverton, Oregon
Bob Brown, sport angler, Arch Cape, Oregon
Daniel Griffin, sport angler, Bend, Oregon
Barbara Scott, sport angler, Nehalem, Oregon
Loren Watts, sport angler, Milwaukie, Oregon
Leonard Meyer, sport angler, Portland, Oregon
Doug Rees, outdoor media, Clackamas, Oregon
Stevan Jovanovic, sport angler, Portland, Oregon
Kurt Doerr, sport angler, Vancouver, Washington
John Maire, sport angler, Wilsonville, Oregon
Patrick Fellows, sport angler, Hillsboro, Oregon
Perry Packard, sport angler, Lake Oswego, Oregon
Mark Grier, sport angler, Newberg, Oregon
Randy Deblock, sport angler, Scappoose, Oregon
James Weber, sport angler, Eugene, Oregon
Mark Herndon, sport angler, Sherwood, Oregon
Mike Bellmore, sport angler, Eugene, Oregon
Brent Johnson, sport angler, Redmond, Oregon
Stephen Gettel, charter boat operator, Milwaukie, OR

Dominic Frederickson, sport angler, Sandy, Oregon
Blaine Ackley, sport angler, Hillsboro, Oregon
Benson Bronfman, sport angler, Portland, Oregon
Richard Tregaskis, sport angler, North Plains, Oregon
Paul Sanders, sport angler, Rigby, Idaho
William Chapman, sport angler, Vancouver, Washington
Dominic Nguyen, sport angler, Portland, Oregon
Lisa Greif, sport angler, Jacksonville, Oregon
Daniel Vorhies, sport angler, West Linn, Oregon
James Barless, sport angler, Beaverton, Oregon
Matt Keikkala, sport angler, Oregon City, Oregon
Dan Durbin, sport angler, Salem, Oregon
Jesse Greenlee, sport angler, Scappoose, Oregon
Lee Richey, sport angler, Tualatin, Oregon
Wayne Lewis, sport angler, Portland, Oregon
Gerald Orlando, sport angler, Salem, Oregon
Parker Nielse, sport angler, Portland, Oregon
Larry Adams, sport angler, North Bend, Oregon
Primo Williams, sport angler, Portland, Oregon
Rick Peterson, sport angler, Oregon City, Oregon
Austin Gower, sport angler, Tualatin, Oregon
Richard Cummings, sport angler, Hillsboro, Oregon
Ronald Pearce, sport angler, Rainier, Oregon
Michael Spadoni, sport angler, Seattle, Washington
Gerald Harris, sport angler, Dallas, Oregon
Jeffrey Hull, sport angler, Portland, Oregon
Hillary Sanders, sport angler, Rigby, Idaho
John Flanagan, sport angler, Albany, Oregon
John Julian, sport angler, Columbia City, Oregon

George Barton, sport angler, Oregon City, Oregon
Bill Lauer, sport angler, Corvallis, Oregon
Matt Bahr, sport angler, Portland, Oregon
Mike Morris, sport angler, South Bend, Washington
David Mustonen, sport angler, Portland, Oregon
John Wheeler, sport angler, Portland, Oregon
Bob Burke, sport angler, Hillsboro, Oregon
Tim Wuest, sport angler, Oregon City, Oregon
Robert Dorig, sport angler, Astoria, Oregon
Marc Lewis, sport angler, Corbett, Oregon
William Steen, sport angler, Keizer, Oregon
Gene Harp, sport angler, Wilsonville, Oregon
David Parker, sport angler, Portland, Oregon
Thomas Gentry, sport angler, Portland, Oregon
Randy Kerr, sport angler, Columbia City, Oregon
Mark Bielemeier, sport angler, Pacific City, Oregon
Jeff Nicol, sport angler, Seaside, Oregon
Mike Yaremko, sport angler, Happy Valley, Oregon
Stephen Dalcin, sport angler, West Linn, Oregon
Chris Hiatt, sport angler, Eugene, Oregon
Brian Senske, sport angler, Oregon City, Oregon
Louis Derch, sport angler, Bend, Oregon
Garry Phillips, sport angler, Milwaukie, Oregon
Neil Gravatt, sport angler, Salem, Oregon
Tom Sundquist, sport angler, Hillsboro, Oregon
Gary Nylander, sport angler, Vancouver, Washington
Charles Blatt, sport angler, Tualatin, Oregon
John McLaughlin, sport angler, Salem, Oregon
Scott Riley, sport angler, Carlton, Oregon

Mark Gibbs, sport angler, Portland, Oregon
John Meek, sport angler, Hillsboro, Oregon
Davorian Fundak, sport angler, Oregon City, Oregon
John Goche, sport angler, Portland, Oregon
Mike Sones, sport angler, Portland, Oregon
Glen Baker, sport angler, Sandy, Oregon
Scott Hall, sport angler, Nehalem, Oregon
Kevin Elder, sport angler, Hillsboro, Oregon
Roger Pearce, sport angler, Portland, Oregon
Bruce McGavin, sport angler, Milwaukie, Oregon
Greg Mcleod, sport angler, Woodland, Washington
Allen Butler, sport angler, Gresham, Oregon
Dan Puffinburger, sport angler, Sisters, Oregon
Andrew Prather, sport angler, LaPine, Oregon
Jack West, sport angler, Jefferson, Oregon
Paul Reich, sport angler, Portland, Oregon
Victor Ceserani, sport angler, Tualatin, Oregon
Jonathon Maner, sport angler, Portland, Oregon
Jerome McCollough, sport angler, Hermiston, Oregon
Jerry McCollough, sport angler, Hermiston, Oregon
Charles Ballrow, sport angler, Camas, Washington
Cody Bloom, sport angler, Portland, Oregon
Jason Henry, sport angler, Sandy, Oregon
Gary Schnicke, sport angler, Three Forks, Montana
Carmine, Campione, sport angler, Lake Oswego, Oregon
Dennis Harman, sport angler, Sumner, Washington
Greg Copeland, sport angler, McMinnville, Oregon
Mike Kuzmanich, sport angler, Damascus, Oregon
David, Renne, sport angler, Renton, Washington

Thomas Havens, sport angler, Carlton, Oregon
David Caney-Peterson, sport angler, Aloha, Oregon
Mike Caldwell, sport angler, Hillsboro, Oregon
Jonathan Rettmann, sport angler, Portland, Oregon
Johnathan Berkompas, sport angler, Yacolt, Washington
Jay Doran, sport angler, Beaverton, Oregon
Matthew Cechovic, sport angler, McMinnville, Oregon
Carlos, Villagran, sport angler, Eugene, Oregon
Richard Wunn, sport angler, Bend, Oregon
Tom Urdzik, sport angler, Wheeler, Oregon
Rick Murie, sport angler, Vancouver, Washington
Joseph Marietta, sport angler, Beaverton, Oregon
Brad Vanderzanden, sport angler, Forest Grove, Oregon
David Smith, sport angler, Portland, Oregon
Richard Ulrick, sport angler, Yamhill, Oregon
Kit Stavrum, sport angler, Oregon City, Oregon
Tadd Kruger, sport angler, Oregon City, Oregon
Thomas Hoogkamer, sport angler, Winlock, Washington
Dinah Urell, publishing, Astoria, Oregon
Daniel Fox, sport angler, Prineville, Oregon
John Fery, sport angler, Salem, Oregon
Gerald Berndt, sport angler, Rockaway Beach, Oregon
Ronald Dejos, sport angler, Yamhill, Oregon
Todd Mylet, sport angler, Portland, Oregon
Joel Aylor, sport angler, Terrebonne, Oregon
Randy Garrison, sport angler, Portland, Oregon
Tom Coffey, sport angler, West Linn, Oregon
Jon Schmidt, sport angler, Milwaukie, Oregon
Tim Wilson, sport angler, Clackamas, Oregon

Jeffrey Elmer, sport angler, Reedsport, Oregon
Stephen Godin, sport angler, Scottsburg, Oregon
Dan Soule, sport angler, Boring, Oregon
Neil Burniston, sport angler, Nehalem, Oregon
Annie Fletcher, sport angler, Illwaco, Washington
Dennis Mathison, sport angler, Kennewick, WA
Brent Potts, sport angler, Bend, Oregon
Rory Denovan, sport angler, Anacortes, Washington
Becca Fong, sport angler, Anacortes, Washington
Howard Mozen, sport angler, Anchorage, Alaska
Romana St. Marie, sport angler, Portland, Oregon
Kevin Trendell, sport angler, Nehalem, Oregon
Gregory Reed, sport angler, Portland, Oregon
Moke Yaremko, sport angler, Happy Valley, Oregon
Michael Guess, sport angler, Canby, Oregon
Gail Cameron, concerned citizen, Astoria, Oregon
Andrew Cameron, concerned citizen, Astoria, Oregon
Clifford Johnson, sport angler, Portland, Oregon
Ray Smith, sport angler, Neotsu, Oregon
Gila Allen, concerned citizen, Astoria, Oregon
Rob Listy, sport angler, St. Helens, Oregon
Veja Lahti, concerned citizen, Astoria, Oregon
John Kulm, sport angler, Quincy, Washington
RL Samspon, sport angler, Bend, Oregon
Jeff Rome, sport angler, Grants Pass, Oregon
Robert, Kelso, sport angler, Oregon City, Oregon
Jeremy Fields, sport angler, Portland, Oregon
Ted Chu, sport angler, Nehalem Oregon
Nancy Cook, concerned citizen, Astoria, Oregon

Doug Firstbrook, sport angler, Nehalem, Oregon

Todd Liebow, sport angler, Gearhart, Oregon

Marianne Monson, educator, angler, conservationist
Astoria, Oregon homeowner/voter/taxpayer

Arline La Mear, former mayor of Astoria
Astoria, Oregon homeowner/voter/taxpayer

Chris Davies, musician, paddler, mushroomer
Astoria, Oregon homeowner/voter/taxpayer

Ute Swerdloff, educator, yogi, forest recreator
Astoria, Oregon homeowner/voter/taxpayer

Beth Kandoll, sustainable food movement
Astoria, Oregon homeowner/voter/taxpayer

Kelly Norton, retired flight attendant
Astoria, Oregon homeowner/voter/taxpayer

Melissa Hunt, student, lifelong Oregonian
Astoria, Oregon

Frazuli Traficante, displaced by wildfire, contractor
Astoria, Oregon homeowner/voter/taxpayer

Kristin Shauck, educator, artist, forest advocate
Astoria, Oregon homeowner/voter/taxpayer

Chris Jabobsen, marine scientist, former charter skipper
Ilwaco, Washington

Gail Cameron, educator, mushroomer, sport fisherwoman
Astoria, Oregon voter

Dan McClure, educator, forest advocate
Astoria, Oregon homeowner/voter/taxpayer

Noelle McClure, Nonprofit management, artist
Astoria, Oregon homeowner/voter/taxpayer

Adriana Sofia Guerrero, Lower Columbia Hispanic Council,
Astoria, Oregon voter

Dr. Scott Ashley, sportfisherman, conservationist
Astoria, Oregon resident serving State Dept. in Ethiopia

Christy Ashley, concerned citizen, conservationist
Vickburg, Mississippi voter

Kristin Shauck, educator, artist, forest recreator
Astoria, Oregon homeowner/voter/taxpayer

Ute Swerdloff, educator, forest recreator
Astoria, Oregon homeowner/voter/taxpayer

Annie Fletcher, public school principal, forest recreator
Long Beach, Washington

Brad Warren, Global Ocean Health, fisherman
Seattle, Washington

Michelle McAffee, writer, forest recreator, salmon advocate
Williams, Oregon

Lesli Larson, educator, angler, forest recreator
Eugene, Oregon

Greg Hayden, paddler, owner Get n Gear outdoor store
Ashland, Oregon

Doug Wilson, MD, conservationist
Wenatchee, Washington

Chris Brothers, educator, salmon fisher, paddler
Fairbanks, Alaska

Robin Child, educator, salmon fisher, paddler
Fairbanks, Alaska

Sophie Littee, salmon fisher, educator, conservationist
Anchorage, Alaska

David Grimes, salmon advocate, commercial fisherman
Cordova, Alaska

Stephens (William) Harper, Enforcement Ranger
McCarthy, Alaska

Tamara Harper, wilderness advocate
McCarthy, Alaska

Michelle Latvala, conservationist, climate advocate
Fairfax, California

Pete Sentvala, architect, conservationist
Fairfax, California

Keira Armstrong, public health advocate, forest recreator
Berkeley, California

Rory Denovan, paddler, fisherman, father,
Guemes Island, Washington

Alberto Napuli, educator, scientist, conservationist
Olympia, Washington

F. Robert Cook, retired Navy, clean water advocate
Spokane, Washington

Sondra Cook, writer, grandmother, native rights activist
Spokane, Washington

Laura Crotty, mother, conservationist
Spokane, Washington

Vera Cook, conservationist
Richland, Washington

Jeremy Pataky, writer, publisher, influencer
McCarthy, Alaska

Dan Kent, Salmonsafe.org founder, Seaside taxpayer
Portland, OR

Tami Kent, women's health practitioner, Seaside taxpayer
Portland, OR

Hi, Barb Shamet here residing in Allegany on the banks of the Millicoma river east of Coos Bay on the southern Oregon coast. I am an advocate for Oregon's forests and our all but gone salmon populations. When I moved here 50 years ago the fish were so thick running up the channels between the rocks right in front of my house, you could see them from my front porch, Today, I have to search high and low, up and down the river bank just to find one lone fish, and good luck with that. Five decades of clear cuts and poisonous phenoxy herbicide spray have all but wiped out this endangered species, which is a federal violation as well as a monstrous loss to our quality of life in general on the entire southern Oregon coast. I urge you and those decision makers to REFRAIN from cutting any and all timber over the age of 65 years, no matter where it grows, These extremely necessary remaining older trees are crucial to our present climate disaster as they store the overabundance of carbon now present in our atmosphere, We have burned too much fossil fuel and cut down too many trees creating an obvious imbalance, thus we now suffer chronic climate catastrophe. Leaving trees will help fix the mess we have made and I implore you folks to take action to ensure their survival as well as ours, the human population. There is evidence that our Pacific Northwest Forests sequester up to 1/3 of the earth's carbon and must remain, perhaps more research is necessary for you to feel confident in this assessment. NOAA with federal dollars can assist in preserving and storage of these magnificent remaining forests under the current Biden administration, these trees must be placed in RESERVE for all time if we are to survive life as we know it. Again, I urge you to take swift action to preserve what is left of all of Oregon's forests. I have personally fought long and hard to protect the Elliott along with thousands of like-minded Oregonians who share my concerns. We are tax paying, hardworking citizens lucky to have our 83 acres up river and we intend to conserve and protect southern Oregon for as long as it takes, respectfully submitted and in peace always, sincerely yours, Barb



Sent Via Email

November 11, 2022

Oregon Board of Forestry
2600 State Street
Salem, Oregon 97310

Dear Chair Kelly and Members of the Board of Forestry:

The undersigned groups are writing to share our perspectives on the continuing challenge of finding the right balance on state forest management. As you know, balancing values on state forests has been difficult and controversial. However, the recent resolution of the Linn County litigation has provided some clarity. Now that it is established that the Board of Forestry has broad discretion to manage our state forests for all Oregonians, and not just taxing districts, we have an opportunity for a broader conversation on the path forward. We believe the Board should adopt a strong Habitat Conservation Plan (HCP) and renew efforts to identify solutions that provide more stability to both taxing districts and the state forest program budget.

We continue to strongly support your work on a Habitat Conservation Plan for Western Oregon State Forests, and we thank you for your commitment to managing Oregon's state forests for the benefit of all Oregonians. We ask that you support an HCP that is at least as protective as Alternative 3, the conservation alternative. Alternative 3 would best ensure the "greatest permanent value" of our state forests by providing necessary long-term protections for fish and wildlife, meeting the challenges posed by climate change, and allowing for ongoing timber harvest. The Habitat Conservation Areas and Riparian Conservation Areas would not only serve the purpose of protecting habitat for threatened and endangered species, but also act as carbon reserves and aid in the implementation of the Climate Change and Forest Carbon Plan.

In order to achieve more stability in state forest management, we strongly encourage you to focus attention on the need for systemic changes to ODF's funding and business model. With the Linn County lawsuit behind you, there is an opportunity for all sides to come together and identify solutions that ensure sustainable funding for local taxing districts while at the same time protecting fish and wildlife habitat and recreation values for Oregon's state forests. This effort will require investment by the General Fund, and we are prepared to support work exploring those outcomes.

The Private Forest Accord is proof that the timber industry, landowners and the conservation community can work together to find solutions. We support solutions that would allow our state forests to be managed for multiple benefits, respond to the stresses of climate change, and identify stable funding sources for necessary local services.

Thank you for your commitment to managing our state forests for the greatest permanent value for all Oregonians.

Sincerely,

Brenna Bell
Forest Climate Manager
350PDX

Jason Wedemeyer
Executive Director
Association of Northwest Steelheaders

Steve Griffiths
Joseph Youren
Directors
Audubon Society of Lincoln City

Bob Sallinger
Conservation Director
Audubon Society of Portland

Lisa Arkin
Executive Director
Beyond Toxics

Grace Brahler
Wildlands Director
Cascadia Wildlands

Noah Greenwald, M.S.
Endangered Species Director
Center for Biological Diversity

Darlene Chirman
Leadership Team
Great Old Broads for Wilderness
Cascade Volcanoes Chapter

Bob Rees
Executive Director
NW Guides and Anglers Association

Mark Rogers
Chair
Oregon Council of Trout Unlimited

Julia DeGraw
Coalition Director
Oregon League of Conservation Voters

Lauren Anderson
Climate Forest Program Manager
Oregon Wild

David Harrison
Conservation Chair
Salem Audubon Society

Victoria Frankeny
Staff Attorney
Tualatin Riverkeepers

Michael Lang
Oregon Senior Policy Manager
Wild Salmon Center

Board of Forestry Meeting, Seaside, OR

November 16, 2022

My name is Kathleen Sullivan, I am a former Clatsop County Commissioner, while serving four years on the Forest Trust Lands Advisory Committee, I witnessed the beginning of this Habitat Conservation Plan, a well-documented public process. Too many FTLAC meetings were cancelled during the litigation of the Linn County Lawsuit, but the refusal to listen was not on the part of ODF.

Opting out of the Linn County lawsuit was the right thing to do, so is supporting this HCP. However, we must find ways to separate the balanced management of our public forest lands in this time of Climate Change from the needed funding for our local communities.

An investigation by OPB, The Oregonian, and ProPublica found that Wall Street real estate trusts and investment funds with control over most of Oregon's private forest lands benefit from timber tax cuts that have cost the counties at least \$3 billion in the past three decades. (1)

Looking for money? Start there. Save our watersheds and habitat, continue with this HCP.

Thank you for this opportunity to give testimony.

Kathleen Sullivan

Astoria, OR

(1)

<https://www.opb.org/news/article/oregon-investigation-timber-logging-forests-policy-taxes-spotted-owl/>

SCIENCE ENVIRONMENT

Big money bought Oregon's forests. Small timber communities are paying the price.

By [Tony Schick](#) (OPB) and [Rob Davis/The Oregonian](#) and [Lylla Younes/ProPublica](#) (OPB)

Falls City, Ore. June 11, 2020 6 a.m.



2022 BOARD OF DIRECTORS

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**building
community.**

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

Dear Chair Kelly and Board of Forestry Members:

On behalf of the Tillamook Chamber of Commerce, I am writing to express concerns over the Oregon Department of Forestry's (ODF) proposed Habitat Conservation Plan (HCP) for western state forests. The Chamber is a private non-profit organization comprised of more than 275 local businesses, organizations and individuals. The Chamber fills a vital role both in the business community and impacts the culture of Tillamook County. We broker connections for our members, assist the growth of local businesses, engage the community to enhance the general quality of life and advocate for a healthy economy. We are discouraged to see that the ODF has jeopardized local forest sector livelihoods and ignored the needs of our members and communities while drafting this HCP.

The negative social and economic effects of this HCP will ripple effects across the North Coast. Revenue from state timber harvests goes far beyond the direct benefits generated from an active forest sector. While those are critical to Tillamook's success, the story doesn't end there. Machine shops, grocery stores, tire factories, among others benefit from the indirect economic activities from state forest timber harvests. If those harvests are reduced, our members in and outside the industry will be affected by the decrease in economic activity.

It would be a loss for all Oregonians if the Tillamook and Clatsop State Forests were to succumb to the same fate as our federal forests, which are now overgrown, prone to wildfire and a liability rather than an asset to surrounding communities. We question why ODF would choose to follow the same failed policies.

We strongly believe that if more local feedback had been solicited and incorporated in the development of this HCP, many shortcomings could have been avoided. The Board of Forestry should take the time needed to draft a more balanced plan that benefits at-risk species and at-risk communities—like ours—alike. The fate of our members and indeed our local economy, depends on your leadership to find a more prosperous and resilient path forward for state forests.

Sincerely,

Justin Aufdermauer

CC: Cal Mukumoto, Oregon State Forester; Jason Miner, Office of Governor Kate Brown

www.tillamookchamber.org



Tillamook School District No. 9

2510 - 1st Street
Tillamook, OR 97141

Curt Shelley, *Superintendent*
503.842.4414 • Fax 503.842.6854
shelleyc@tillamook.k12.or.us

November 10, 2022

Honorable Kate Brown
Office of the Governor
900 Court Street NE Suite 254
Salem, Oregon 97301

VIA EMAIL:

Governor's Natural Resource Policy Director: Jason.miner@oregon.gov
Oregon State Forester: cal.t.mukumoto@odf.oregon.gov
Oregon Board of Forestry: hilary.olivos-rood@oregon.gov

Governor Brown:

On behalf of the Tillamook School District 9, we are writing you to express our opposition to the draft Habitat Conservation Plan (HCP) prepared by the Oregon Department of Forestry (ODF) for western State Forests. These lands were deeded to the state from the counties, and are now managed by the Oregon Board of Forestry (BOF) to achieve the Greatest Permanent Value (GPV) (OAR 629-035-0020).. Regrettably, the HCP ODF has prepared does not balance the social, economic, and environmental goals needed to meet GPV.

For years, Tillamook County and the Forest Trust Land Advisory Committee (FTLAC) (ORS 526.156) have adamantly expressed concerns over the process to develop the HCP. There have been repeated requests to be part of the drafting and review committees, but they have been refused each time. There have been questions to both the ODF and the BOF on how this plan will impact our communities, but to date, there have not been adequate answers provided. To call FTLAC counties "partners" of the state, and then to turn around and ignore their requests and advice, is insincere and offensive.

Given the lack of meaningful consultation with the counties, it is disappointing but not surprising that the draft HCP fails to appropriately estimate or defend the human dimension and values of these forests. The first concern is that the HCP commits huge swaths of state land to "non-management as a strategy for species protection. That is all too reminiscent of federal land management under the Northwest Forest Plan. We have learned the hard way that the non-management of our forests leads to economic

harm and profound health costs through wildfire and smoke pollution, and it also fails to reverse population declines for iconic species like the Northern Spotted Owl. The second and equally concerning aspect of the HCP is the 70-year timeline. The economic and physical conditions in our state are changing very rapidly and we must be able to change with them for the best outcomes. By committing to this plan, which will be controlled by the state, for 70 years with very limited available actions, leaves Tillamook County with almost no say in our destiny. If this process had been done with full participation and full transparency among the "partners", perhaps this would be somewhat less concerning.

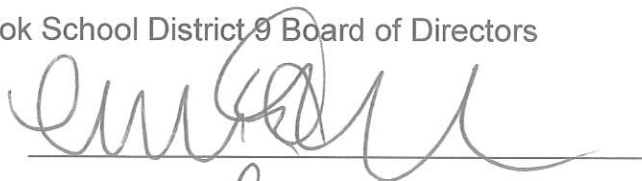
The lack of forest management, should this pass, puts Tillamook County at risk of fires and with that a possible economic downturn as stated. For Tillamook School District, it could mean a loss of State Timber revenue, which could have an impact on education funding. If jobs were to be lost, it could also mean declining enrollment, and therefore further decreased funding.

Tillamook County and many other counties are trying to prepare for the increasing risk of natural disasters and to protect our citizens and critical infrastructure. We face potentially catastrophic earthquakes and tsunamis as well as more frequent and severe storms, and now increased risk of wildfire. We need the ability to engage in activities that bolster economic resilience in our economy, both today and in the future. Under this HCP, counties are being forced to spend the next 70 years under a plan that limits options, opportunities, and the ability to choose our own future.

We understand that ODF has the legal authority to create a plan and that the BOF can adopt this HCP. Before adopting the plan, please consider the way in which this HCP was developed and the style of management it proposes. We respectfully ask that you intervene in this process to ensure that the state HCP does not create unnecessary risks and hardships for the counties that surround and depend on these forests.

Sincerely, Tillamook School District Board of Directors

Matt Petty, Chair



LaDonna Coon, Vice Chair



Kris Lachenmeier



Kurt Mizsee



Jesse Werner



November 11, 2022

Oregon Board of Forestry
2600 State Street
Salem, Oregon 97310

Dear Chair Kelly and Members of the Board of Forestry:

The Coast Range Association (CRA) is writing to share our view on state forest management. Based on past Oregon Attorney General Opinions and the resolution of the Linn County lawsuit, the Board of Forestry has broad discretion over the management of state forests. We believe the Board should adopt a strong Habitat Conservation Plan (HCP).

The CRA supports your work on a Habitat Conservation Plan for Western Oregon State Forests. We ask that you support HCP Alternative 3, the conservation alternative. Alternative 3 will not only protect habitat for threatened and endangered species, but also support the implementation of the Climate Change and Forest Carbon Plan.

The debate over the State Forest Habitat Conservation Plan has made clear; the overriding issue for the Department of Forestry and local taxing districts is the need for systemic changes to funding. Funding solutions are the responsibility of the Legislature and the Governor. A Department of Forestry serving all Oregonians needs to be funded through the General Fund.

A November, 2022 report* by the Oregon Center for Public Policy states "*The wealthiest 1 percent of Oregonians collectively own about \$588 billion, more than a third of all wealth in the state and more than the bottom 90 percent of Oregonians own together.*" All the while, many, if not most, rural areas see economic decline and population loss. The Coast Range Association avoids stakeholder processes that argue over the scraps of policy space left over by the undue influence of concentrated wealth and corporate power.

Proper, fair taxation for local governments and taxing districts requires changes to the state's constitution. A new constitutional ballot measure is required to return Oregon to a common sense system of taxation.

Thank you for your commitment to managing state forests for the greatest permanent value for all Oregonians. Such management is no small challenge given a system of taxation that hinders service to the common good.

Sincerely,

Chuck Willer
Executive Director
Coast Range Association

* Oregon Center for Public Policy report **Wealth Inequality in Oregon Is Extreme** accessed at: <https://www.ocpp.org/2022/11/03/wealth-inequality-oregon-extreme/>

Subject: Item 1 - Pass a strong Habitat Conservation Plan for Western Oregon Forests

Campaign Message:

As somebody passionate about Oregon's natural public lands, I am writing to express my strong support for the passage of the Western Oregon Forests Habitat Conservation Plan (HCP) Alternative 3 (or stronger). Passing a strong HCP for Western Oregon's forests is the only way for our state to better protect these ecosystems, which include threatened & endangered species as well as old-growth trees, from environmentally harmful clear-cutting practices and preserve them for future generations.

There is no good reason for clear-cutting to continue in our state forests. Destructive industrial logging lays waste to the ecosystems that Oregon's endangered species rely on to survive. And, clear-cutting is a major source of pollution for waterways and rivers that provide crucial habitat for endangered salmon and provide clean drinking water for rural communities.

Essential county services should never have to rely on revenue from irresponsible timber harvesting on public lands. It was never fair to pit ecosystem health and clean drinking water against essential services, which is why we support finding a way to decouple county tax revenue from logging on public lands. Beyond harboring many at-risk species, forests serve as enriching destinations for recreation for outdoor enthusiasts. Public forests provide biodiversity, natural wonder, and positive memories to our state. Let's work together to protect the natural legacy of our public forest lands for the benefit of all. Please safeguard Western Oregon's forests by passing the Habitat Conservation Plan.

Submissions: 706 emails received by November 30, 2022