



# Associated Oregon Loggers, Inc.

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**Date:** June 7, 2023  
**To:** Board of Forestry  
**From:** Amanda Sullivan-Astor, Forest Policy Manager  
Associated Oregon Loggers

**Topic:** Agenda Item #1 – Public Comment

Good afternoon, Chair Kelly, State Forester Mukumoto and members of the Board,

For the record, my name is Amanda Sullivan-Astor. I am the forest policy manager for Associated Oregon Loggers, a certified forester through the Society of American Foresters and a new mom.

Associated Oregon Loggers (AOL) serves nearly 1000 individual small businesses and 23,000 hardworking Oregonians. AOL represents the workforce that is ready to steward our forests every day through landscape restoration treatments, prescribed fire, road maintenance and more. They are the critical workforce ODF relies on to achieve each and every goal and objective in each and every strategic plan created by or for the Department.

## The Issue

In order to represent this unique group of stakeholders, I have the honor of working with the Department, the Board and other agencies on most if not all of these strategic plans. So, AOL tries to connect each of these plans and efforts to each other, using the same words, priorities, goals, objectives and metrics to ensure continuity. We are engaged at different levels with the 20-Year Landscape Resiliency Strategic Plan, the State Forest Management Plan, the Forestry Program for Oregon, the Oregon Global Warming Commission's Natural and Working Lands Climate Smart Forestry Practices and Metrics and the Environmental Justice Mapping Tool for the state.

The problem is, the professional foresters and experienced operators who actually work in the woods on federal lands, private lands and state lands alike can't seem to place their fingerprint on any of these plans. They can't see themselves in these plans, nor can they be proud of them. ODF has many professional foresters on staff working closely with these natural resources every day on the ground, yet they don't see themselves in any of the strategic planning efforts ODF is engaged in developing.

As an example, ENGOs and the forest sector alike, both agree the current draft 20-Year Plan, you'll be getting an update on later today, does not meet legislative intent. The plan does not actually direct funds for priority actions, in priority geographies in *tangible ways*. It does not build off of field forester expertise nor does it incorporate directly applicable work others in the Department are engaged in in other venues. The 20-Year Plan does not fully integrate the recommendations of the National Wildfire Cohesive Strategy nor the Governor's Council on Wildfire Response. It does not seem to be coordinated with the Department's work with the Oregon Global Warming Commission's Natural and Working Lands Practices nor the Department of Environmental Quality's Biomass Utilization Working Group, yet the Department has already recommended priority actions and metrics around reducing wildfire risk and emissions while increasing resiliency associated with these work products. Why haven't they been incorporated?

AOL is also worried about the lack of connection in the FPFO to the on-the-ground forestry professionals in ODF's ranks and in the private sector support network these folks work with each day. In initial conversations with the Oregon Kitchen Table, we highlighted this fact and asked for a concerted effort to incorporate these voices. They are the real heart and soul of the Department and are the professional voices

***“Growing service & voice for loggers and forest operators since 1969”***

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in the room who will be directly affected by this strategic document. Federal foresters who actually work on the ground also are disenfranchised in the process for development of this plan.

## **Conclusion**

For all of the strategic planning efforts that ODF are engaged in, the voices of the field staff seem to be all but ignored or incorporated. By focusing coordination between agencies both state and federal, at the very top, it strips the plan from truly incorporating the voice of the working professionals most connected to our natural resources.

It is telling when ENGOs and the forest sector are working hard to collaborate and agree on shortfalls within these planning efforts. I hope the direct stakeholders and communities who care deeply about meeting the needs of the present while promoting the ability of future generations to meet their own needs. These individuals practice a land stewardship ethic that integrates reforestation and the managing, growing, nurturing and harvesting of trees for useful products, and for the provision of ecosystem services.

I was asked recently, “what do you like most about your job.” As I thought and pondered, my response was, “that I get to tell my 8-month-old daughter one day that mommy was a part of creating (or at least trying to create) balanced solutions so my daughter’s generation doesn’t have to deal with the same wicked problems mine did”.

**AOL would like to see leadership and strength from this Board in directing the Department to allow their field practitioners to be as proud of the strategic planning documents coming out of Salem as the those directly working on them.**

Sincerely,

Amanda Sullivan-Astor  
Associated Oregon Loggers  
Forest Policy Manager  
aastor@oregonloggers.org



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Oregon Board of Forestry,

Hello, my name is Trace Hahn. I'm a mechanical engineer who has worked in research and development for the past 11 years, working with scientists and engineers solving difficult problems. I am here now in a different capacity, working for and representing B&G Logging. This company has exponentially contributed to economic growth, far reaching into many communities and families.

We are here today because of a much larger problem to solve, the HCP and its potential impact on communities, families, and businesses throughout Oregon. Simply put, the HCP is designed to avoid and reduce impacts on terrestrial and aquatic species that are currently listed on the Endangered Species Act, however it does not avoid and reduce economic and social impacts on humans.

The HCP was developed by ODF without stakeholder input or meeting with counties or taxing districts. It was also drafted before accurate and up-to-date data could be used and its impacts analyzed.

The idea was suggested during the Oregon Board of Forestry meeting on March 8<sup>th</sup> to increase rotation times between harvesting from 40 years to 80. *Defect percent* is low in young-growth trees but can be as high as 70% or more in older growth trees with advanced decay. Increasing rotation times in the forest will significantly increase the total forest defect percent. Unmanaged forests will substantially increase wildfire occurrences, thereby reducing terrestrial and aquatic species.

Sawmills are designed and built for small logs. It would cost hundreds of millions of dollars to re-tool mills to process big logs with no guarantees to a log supply, as a result the economic impact of timber loss to the communities throughout the Northwest would be profound.

The HCP is proposing a reduction in harvest by 34% with a range of 165-182.5 MMBF, as opposed to the annual average of 226 MMBF. That is a reduction of up to 61 MMBF. With an average price of \$700/MBF for logs in 2023 that is \$42,700,000 in lost revenue from logs alone.

I cannot see the solution to this problem, given that there are so many unknown variables. Therefore, more research should be done. The magnitude of the economic and wildfire effects of this HCP will be far reaching and unpredictable if implemented. We urge you to re-evaluate the HCP.

Sincerely,

Trace Hahn

B&G Logging & Construction, LLC.

**From:** [FORESTRY Boardof \\* ODF](#)  
**To:** [OLIVOS-ROOD Hilary \\* ODF](#)  
**Subject:** Fw: HCP Comments from Mayor of Warrenton  
**Date:** Thursday, June 15, 2023 1:13:24 PM

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**From:** Henry A. Balensifer III <hbalensifer@ci.warrenton.or.us>  
**Sent:** Tuesday, June 6, 2023 7:31 PM  
**To:** FORESTRY Boardof \* ODF <boardofforestry@odf.oregon.gov>  
**Cc:** Mark Baldwin <mbaldwin@ci.warrenton.or.us>  
**Subject:** HCP Comments from Mayor of Warrenton

Chair Kelly, Members of the Board of Forestry:

As the mayor of Warrenton, which has multiple timber-reliant businesses in it, I wish to express significant concern about the adoption of the HCP as under consideration right now.

I regret that I am unable to join you in person to deliver the position of my city in person. I have delegated that to Mayor Pro Tem Baldwin. However, I felt it absolutely necessary that you heard from me directly and my message embodies my position personally and as Mayor of Warrenton.

I do not work in timber, however I have many constituents who do. The HCP, without being re-evaluated for its socio-economic impacts or without selecting a reasonable alternative will condemn communities like mine to permanent second class citizenship.

In my day job, my company manufactures electric vehicles in Warrenton and has been here since 1948. As I write this, our parent company is setting up manufacturing sites in India because it is cheaper to fabricate, assemble, and ship new vehicles to the USA from there than it is to do the same in Oregon. I have heard suggestions that coastal and resource dependent communities will just need to “pivot” and find other industries. I ask you this: outside of communities near the I-5 or I-84 freight corridors, what can we on the coast realistically pivot to?

Your decisions have a human cost. Crime, drugs, depression, domestic violence and suicides accompany depressed economies. Just look at timber reliant counties a decade after the NW Forest Plan demolished their economies. Look at coastal communities now—as we struggle with the effects of urbanites buying up all the housing stock for second homes and vacation rentals. The privileged get richer and the poor get poorer. The currently proposed HCP adds to that poverty as its harvest levels are significantly lower than previously assumed.

I also want to disabuse this board of any suggestion of tourism being any sort of answer. Tourism benefits the business owners, but condemns the local workforce to low wage, often seasonal jobs in what is now an unaffordable housing market. If that’s not bad enough, most policy makers do not understand how local government revenues are generated. Property taxes are permanently set thanks to voter initiatives passed in the nineties, and the valuations do not reset upon sale. Transient lodging tax law as set by the state requires 70% of those funds go back to promoting tourism, leaving

only 30% to fund police, fire, and other general fund needs. In short, we're not going to replace lost family-wage jobs with tourist jobs and expect good results. We also can't take the hit from the loss of high-value industrial properties going idle.

I believe we can protect our environment and address issues pertinent to healthy forests and climate change without condemning the communities reliant on healthy forests now and in the future to certain decline. It just needs a closer look. The HCP is not some changeable short term policy—it has strategic, long term effects. Please remember the human costs as you weigh your decision and take another look at this plan.

Sincerely ,

**Henry A. Balensifer III**

**Mayor**

**City of Warrenton**



To follow what's going on in our city like us on Facebook:

[Mayor Henry Balensifer FB Page](#)

[City of Warrenton Admin/General FB Page](#)

[Warrenton Police Department FB Page](#)

[Warrenton Fire Department FB Page](#)

**From:** [FORESTRY Boardof \\* ODF](#)  
**To:** [OLIVOS-ROOD Hilary \\* ODF](#)  
**Subject:** Fw: Shaelyn Bangs Testimony  
**Date:** Thursday, June 15, 2023 1:24:14 PM

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**From:** Courtney Bangs <cbangs@clatsopcounty.gov>  
**Sent:** Wednesday, June 14, 2023 11:51 PM  
**To:** FORESTRY Boardof \* ODF <boardofforestry@odf.oregon.gov>  
**Subject:** Shaelyn Bangs Testimony

I'm Shaelyn Bangs and I'm just here to tell you my why. Why I keep showing up at your meetings concerned about your HCP decision? It's the same reason I've shown up to Salem to speak to senators and representatives or why I've written to Rep Bonimichi and Senator Wyden. It's because rural kids don't receive the same level of access to resources as our peers in bigger cities.

This year as a 7th grader I was diagnosed with clinical OCD and anxiety. My family and I have been in a constant struggle to find me consistent care and counseling. I was waitlisted multiple times for over 3 years. Three years without assistance is just wrong. I know I'm not alone. You walk into any rural school and you'll find multiple stories about lack of access and kids falling through the cracks, in a multitude of topics from educational to health care.

Your HCP will only cause our lack of access to be greater. I wish us kids were the first concern you spoke about instead of as an unintended consequence to a decision you'll make. Something to fix at a later date. Who's going to

fix it? The state government? I don't see that happening anytime soon.

My community social concerns that will face budget cuts and losses are as follows: Stream restoration, safe recreation and camp sites, educational opportunities, law enforcement, senior care, emergency response, grants for nonprofits, caring for our houseless population, extra curricular children's programming, and the list continues. Add in the huge amount of job loss. These things shouldn't be an afterthought or an oops.

I think the saddest thing is that **an** HCP process has occurred recently in Oregon, one that included business leaders in the conversation. It's proof collaboration is possible. I can't help but think this didn't have to be this way when a better way has already been illustrated.

Courtney Bangs  
Clatsop County Commissioner District 4  
Mail Address: 800 Exchange St., Suite 410, Astoria OR, 97103  
Phone: (971) 286-0175  
Email: [cbangs@co.clatsop.or.us](mailto:cbangs@co.clatsop.or.us)

"Let nothing be done through selfish ambition or conceit, but in lowliness of mind let each esteem others better than himself. Let each of you look out not only for his own interests, but also for the interests of others."

Philippians 2:3-4

This message has been prepared on resources owned by Clatsop County, Oregon. It is subject to the Internet and Online Services Use Policy and Procedures of Clatsop County.

**From:** FORESTRY Boardof \* ODF  
**To:** OLIVOS-ROOD Hilary \* ODF  
**Subject:** Fw: June 2023 Board of Forestry Meeting Written Comments – Agenda Item 1, HCP  
**Date:** Thursday, June 15, 2023 1:20:17 PM

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**From:** Helena Birecki <[REDACTED]>  
**Sent:** Monday, June 12, 2023 3:17 AM  
**To:** FORESTRY Boardof \* ODF <boardofforestry@odf.oregon.gov>  
**Subject:** Re: June 2023 Board of Forestry Meeting Written Comments – Agenda Item 1, HCP

Dear Chair Kelly and Board of Forestry Members,

I appreciate the opportunity to comment in support of a strong Habitat Conservation Plan. I live in Tillamook County and recognize that the health of our forests is key to my own-- and all my neighbors-- health and wellbeing.

I live near a protected area, and can see clearly that the root system, shade and rain-drawing capacity of the old forest protects me and my family from extreme heat, flooding, landslides, and likely even wildfire. When I walk on paths in the protected area, the soil is thick and cushiony, and moist even late in the summer.

Nearby hills that have been clearcut bake in the sun; the grasses have no shade and the ground already looks dry and crumbly in June. Oregon State University research\* shows that such slopes are indeed much more susceptible to landslides and flooding than mature forests.

Healthy forests also protect salmon runs and wildlife, and increase both quality and quantity of drinking water. It's been documented that "keeping forests healthy is often cheaper than relying on expensive man-made filtration systems."\*\* I heard the Manager of the Nekowin Water District express concern in a town hall about the impacts of clearcutting on our water.

I urge the Board of Forestry to adopt a final Habitat Conservation Plan with the strongest conservation alternative as quickly as the process allows. Managing forests sustainably supports the health and wellbeing of the people who live near them, and work and recreate in them.

Sincerely,  
Helena Birecki  
resident of Neskowin, Tillamook County, Oregon

\* <https://today.oregonstate.edu/news/forest-landslides%E2%80%99-frequency-size-influenced-more-road-building-logging-heavy-rain>

\*\* <https://www.wri.org/insights/3-surprising-ways-water-depends-healthy-forests>



**From:** [FORESTRY Boardof \\* ODF](#)  
**To:** [OLIVOS-ROOD Hilary \\* ODF](#)  
**Subject:** Fw: State Forest HCP, June 7 agenda item 1  
**Date:** Thursday, June 15, 2023 1:16:22 PM

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**From:** candace bonner [REDACTED]  
**Sent:** Thursday, June 8, 2023 6:22 PM  
**To:** FORESTRY Boardof \* ODF <boardofforestry@odf.oregon.gov>  
**Subject:** State Forest HCP, June 7 agenda item 1

June 7, 2023

Comments on Agenda item #1, State Forest Habitat Conservation Plan

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

I urge you to adopt the strongest possible HCP for our State Forests.

I am a small forest owner who lives on my forest land. I have a CoCoRAHS precipitation station on the property. We now have gone 30 days without rain, during what should be a rainy NW Oregon spring. Predictions are for the hottest summer on record. Climate change is accelerating, and no one is meeting targets for emission reductions. Even if we (the planetary we) were able to reach Net Zero on schedule, we still would need to remove CO2 from our atmosphere. Oregon's best tool for removing CO2 is our forests.

I felt compelled to add my voice again to the call for a strong HCP after listening to this morning's comments. The economic hardship arguments in favor of a weak HCP with greater timber harvest are moving, and matter. It is easier to see the connection between these jobs in logging, trucking and milling and the amount of harvest allowed, however, than the connection to greater timber harvest and the jobs that are lost, the crops that are lost, the lives that are lost, as climate change accelerates. Those losses too are real, and of a greater level of magnitude. We need to use our most effective resource, our forests, to mitigate progressing climate change.

The Center for Biological Diversity estimates another one million plus species are likely to become extinct in the next decades, primarily due to habitat loss and climate change. A strong HCP must consider both the habitat needs of the species at issue, as well as the effects on climate change of larger harvests vs greater protection of the forest, especially the older trees.

I urge you again to look at all your decisions through the lens of climate change, and adopt the strongest possible HCP.

Thank you for the opportunity to participate in public input,

Respectfully,  
Candace Bonner  
Corbett, OR

Oregon Board Of Forestry 6/7/2023

My name is Ted Chu. I am a full time resident and property tax payer in Tillamook County. I hike, hunt and fish on state forest land and I and several of my neighbors get our culinary water from drainages that head on state forest land in the Coal Creek watershed. I traveled here to urge you to adopt a strong Habitat Conservation Plan. My preference is Alternative 4 however in the interest of compromise I will support Alternative 3.

The huge private timber lands that surround and intermingle with our public forests will never again hold old or even mature growth. While private silviculture techniques demonstrate trees are a renewable resource their typically short rotation even age application proves forests are not. You truly can't see a healthy forest for the plantations. I may not like that but I accept it. Our public lands should not be managed in the same single value approach.

In my coast range hiking I see the stumps that are all that remain of the old growth western red cedar forest. To the best of my knowledge there are only eight old growth red cedar trees between Tillamook and Astoria where once there were at least tens of thousands. They are all that's left of an extinct habitat type that was once common, perhaps dominant. We now know better. A recent inventory found very little mature or old growth forest remaining on the Oregon coast range. [https://www.andykerr.net/kerr-public-lands-blog/2023/5/31/how-much-mature-and-old-growth-forest-does-the-us-have-left?fbclid=IwAR2dwCHEVgWsa8MdQ4L90rz13EZALUW-5liLh9gD6DSGww055D5U\\_6ktZDA](https://www.andykerr.net/kerr-public-lands-blog/2023/5/31/how-much-mature-and-old-growth-forest-does-the-us-have-left?fbclid=IwAR2dwCHEVgWsa8MdQ4L90rz13EZALUW-5liLh9gD6DSGww055D5U_6ktZDA)

To offset the solely for profit management on industrial timber land the management of our public lands should be at least doubly sensitive to the needs of species that require old growth and clean cold water. We are one of those species with our needs for drinking water and irrigation water for our Tillamook dairies. I believe water is the most valuable yield of our forest land and it will only become more valuable with time as the climate warms.

The change in state forest management direction contained in the HCP is driven by some threatened and at risk species some of which have immense commercial value to Oregonians and all of which benefit from old growth and high quality water. The plan can be fairly simple then it seems - manage for old growth, decommission some existing roads and build no new ones and you will meet both short and long term goals. As a perhaps unintended consequence applying the HCP is good strategy to combat climate change, something Oregon state agencies are officially obligated to adopt.

The HCP is exactly the right thing to do at exactly the right time. We've had enough hearings. Please make a decision and adopt Alternative 3.

Ted Chu  
41400 Anderson Rd  
Nehalem, OR 97131  
971-227-3422 [yuiqwe1@gmail.com](mailto:yuiqwe1@gmail.com)

## Oregon Board of Forestry Meeting

June 7, 2023. Sisters, OR

For the record, I am Chuck Willer, Executive Director of the Coast Range Association.

[www.coastrange.org](http://www.coastrange.org)

Chair Kelly and members of the Board of Forestry,

Thank you for the opportunity to speak briefly and provide written comments.

As part of my testimony I suggest Board members review two items available online.

They are:

1. The first five minutes of a lecture by professor Damon Silvers, **Understanding Neoliberalism as a System of Power**. Professor Silvers is a Visiting Professor of Practice at the University College London's (UCL) Institute for Innovation and Public Purpose. Since the Reagan revolution and the ascendancy of the neoliberal era, the purpose of government has been hollowed out and its remaining features are left weakened. Now in a post-neoliberal era of crises and need, governments struggle to find the resolve and will to meet today's challenges. I believe professor Silver's lecture is relevant to challenges facing the Department of Forestry and the Board of Forestry's work.

Here is the video's url:

<https://www.youtube.com/watch?v=hLtkJ-AgLuY>

Or, just query the title at the YouTube's home page.

Additionally, Board members will likely find many useful items at the *Institute for Innovation and Public Purpose* website here:

<https://www.ucl.ac.uk/bartlett/public-purpose/>

2. I bring to your attention is a new report published by the CRA in May titled **Wealth, Income and Oregon's Rural Communities**. The report explains how private timber sales dollars flow through a timber company and end up as someone's income. We explore where the timber dollars are spent and who receives those dollars. We then offer a proposal to keep more timber wealth in local communities.

The report is available on the homepage of the CRA's website at [www.coastrange.org](http://www.coastrange.org)

I'm sure Board members will find useful information in the report for a broad range of policy issues and programs the Oregon Department of Forestry is pursuing.

Below are written comments speaking to ~~is~~ the State Forest Habitat Conservation Plan (HCP). The HCP has come under coordinated attack by lumber interests who stand to gain from increased state forest timber cutting. As is common in Oregon, political leaders dread a fight with the big players in the wood products industry. So it falls to non-governmental organizations to support proper, public interest forest management.

Recently, I sent conservation colleagues comments I wrote in 1997 about a proposed habitat conservation plan for state forests. At the time, the state of Oregon, at the behest of the timber industry, conspired with the National Marine Fisheries Service (NMFS) to **not** list the coastal Coho under the Endangered Species Act (ESA).

The Coast Range Association (CRA) and others sued NMFS over the Coho's non-listing. We won in federal court and the coastal Coho was listed. The timber industry had a hissy fit over the listing and declared there would be no further work on western Oregon Habitat Conservation Plans.

The **private forest accord** worked out between various conservation groups and big timber was, in part, a catch up effort to overcome the wood products industry's 1997 ending of HCP work.

Over the past several years, the Board was making progress with the HCP. Last summer, NMFS issued a Draft Environmental Impact Statement (DEIS) for the HCP. The four options described by NMFS were about the same – each cut a lot of timber. Here are the numbers from the DEIS (Page 3.1-2 of the Draft Environmental Impact Statement for the Western Oregon State Forests Habitat Conservation Plan).

Modeled **Average Annual Harvest Volume** by Alternative (First 25 years of the Plan)

<b>No Action</b>	<b>ODF's Proposed Plan</b>	<b>Alt. 3</b>	<b>Alt. 4</b>	<b>Alt. 5</b>
179.3	247.0	246.1	247.0	258.0

Each number above is in **millions of board foot** timber.

The HCP's proposed timber harvest for all options is in the same range as the state forests' average yearly harvest of about 250 million bf between the years 2010 to 2019.

So, why are lumber mill interests and their minions on the north coast now up in arms? I admit I'm a bit confused. Here are two theories as to what's going on.

1. Never underestimate the timber and milling elite's ability to believe and argue for something that's wrong. These are smart, educated and highly paid people who have a record of talking themselves into unwise things. The failed Linn County

lawsuit, where counties claimed the state owed them zillions of dollars in past state forest timber revenues, is one example.

2. Clatsop County officials are crying crocodile tears over imagined future state forest timber revenue loss due to error filled arguments and overstated concerns. Last October, Clatsop County commissioners passed an embarrassing proclamation opposing the proposed state forest HCP.

So what is going on? I think it boils down to several north coast lumber corporations having more milling capacity than they have timberland. Perhaps all the investment in automation and high production equipment over the past decade was premised on a belief that our state forests were going to be their corporate tree farm. If so, it is one more example of the wood products industry seeing itself entitled. Just because you build great big sawmills doesn't mean you are entitled to any trees.

I urge the Board of Forestry to stay the course and complete the HCP. A HCP allows for robust timber harvest, more forest carbon sequestered and the provision of necessary habitat for endangered species. Please don't be pushed off course by false issues and imagined problems.

Thank you for the opportunity to provide these comments.

For Board members who wish to have an electronic version of these comments for live webpage links, I emailed a copy to Board Administrator Hilary Olivos-Rood.



# Clatsop County

## Board of Commissioners

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May 26, 2023

Cal Mukumoto  
State Forester  
2600 State Street  
Salem, OR 97310

Dear Mr. Mukumoto,

The Department of Forestry is coordinating policy development, regulatory updates, and ESA compliance simultaneously in both the State Forests and the Forest Resources Divisions; thus, the Private Forest Accord (PFA) development is concurrent with State Forests Habitat Conservation Plan (HCP) development.

It is our Board's understanding that the Department of Forestry is attempting to obtain a stewardship agreement with the Forest Resources Division to gain alignment with current and near future PFA requirements. Based on this understanding, the Clatsop County Board of Commissioners makes a formal request to include all Board of Forestry lands listed in the State Forests HCP in the PFA HCP permit area. Rather than obtain a stewardship agreement that provides legal sufficiency with PFA without Federal ESA coverage for Coho; it is our understanding that there is still time to include Department of Forestry lands within Clatsop County in the permit area of the proposed HCP.

The Board of Commissioner request is based on the following:

- Ensures policy consistency, standards, and legal sufficiency in forest management on Department of Forestry lands with Forest Practices Act;
- Provides contingency ESA coverage of Coho, should the State forests HCP not be adopted or delayed;
- Current State Forest HCP has demonstrable needs for improvement, and this allows ESA protection during the interim as the tool matures;
- It is aligned with litigation settlement agreements;
- A delay in this decision could be very difficult to rectify once the NEPA process begins.

To summarize, Clatsop County requests all Department of Forestry lands listed in the State Forests HCP be included in the PFA HCP permit area.

Thank you for your consideration.

Sincerely,

Mark Kujala, Chair  
Clatsop County Board of Commissioners

C: Josh Bernard, Forest Resources Division Chief  
Mike Wilson, State Forests Division Chief  
Geoff Huntington, Governor's Office  
Board of Forestry Members  
Jim Kelly, Chair  
Liz Agpaoa  
Karla Chambers  
Ben Deumling  
Chandra Ferrari  
Joe Justice  
Brenda McComb

**From:** [FORESTRY Boardof \\* ODF](#)  
**To:** [OLIVOS-ROOD Hilary \\* ODF](#)  
**Subject:** Fw: June 6, 2023 Tesitmony  
**Date:** Thursday, June 15, 2023 3:37:50 PM

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**From:** Courtney Bangs <cbangs@clatsopcounty.gov>  
**Sent:** Thursday, June 15, 2023 10:22 PM  
**To:** FORESTRY Boardof \* ODF <boardofforestry@odf.oregon.gov>  
**Subject:** June 6, 2023 Tesitmony

June 6, 2023 Testimony

My comments today circle around Clatsop County's budget and equity concerns moving forward. The urban rural divide will only grow greater because of the negative fiscal impacts of this proposed HCP. This financial model has worked for over a century and still could if an inclusive process could take place. The only reason why it will fail is because of the failure of your staff in not including an operational or economic representative in the room when developing this plan.

I've spent three years being frustrated with your board because I knew that the modeling that you were being given to make your decisions from was false, I knew that you would never be able to reach the long promised 225 mmbf with this plan. I've had front row seats witnessing a government agency not following good governance methods by not including stakeholders and tribes within the process. Our county, a county who has always had a mind of its own and has supported you for decades, was pushed outside the room with the rest of the general public and now will be the county that shoulders the greatest percentage of burden both socially and financially with this planned HCP. I had to find grace for those of you making your decisions and remember that I too must trust what my staff gives me each day and make my decisions upon those recommendations and often quiet outside noise. That outside noise for you was Clatsop County.

I spoke to your staff on numerous occasions to no avail regarding large operational flaws in the Draft EIS, I spoke of flaws in the modeling, I requested edits to the plan, I spoke of our lack of active owl sites, I spoke of social concerns that were not accounted for by your staff, I spoke of alternative methods that would help you achieve your goals while also preventing bankruptcy to your department. My goal was never to not have an HCP, but to make sure that we did the absolute best to honor the county's social and economic concerns along with the environmental concerns. My goal was to find balance. That balance is not and will not be achieved by this HCP.

The lack of balance was highlighted during our county's budget process when we discussed the 1.4 million dollar loss to our rural law. Our county's health department just



located a student health center in the Jewell School District, a community and school close to an hour from other services. It's a school also not part of the school equalization fund and sadly will be almost completely defunded by this plan. That community will suffer greatly with no way to make up for the loss of finances and social services.

Rural counties always suffer equity issues. I read the multiple plan options, they all provided similar outcomes for the aquatic and terrestrial animals. What wasn't similar was the outcomes for the community, for the people. Decoupling won't solve the job loss caused by a 34% reduction in harvest nor are we promised funding to make up for our losses. Please consider a new HCP process, one that involves stakeholders from the beginning vs involvement after the plan is written and submitted.

Courtney Bangs

Clatsop County Commissioner District 4

Mail Address: 800 Exchange St., Suite 410, Astoria OR, 97103

Phone: (971) 286-0175

Email: [cbangs@co.clatsop.or.us](mailto:cbangs@co.clatsop.or.us)

“Let nothing be done through selfish ambition or conceit, but in lowliness of mind let each esteem others better than himself. Let each of you look out not only for his own interests, but also for the interests of others.”

Philippians 2:3-4

This message has been prepared on resources owned by Clatsop County, Oregon. It is subject to the Internet and Online Services Use Policy and Procedures of Clatsop County.

To: Board of Forestry Members  
Submitted for the June 7, 2023 meeting  
From: Cheryl Conway, Astoria resident  
Re: HCP---Your Legacy?

Thank you, members of the Oregon Board of Forestry, for holding this hearing today. I appreciate the opportunity to speak and appreciate the time and effort you have given as members of this board. I cannot imagine how much pressure you have endured during this sustained, long-term process of developing the Habitat Conservation Plan. You have heard so many contradictory figures for revenues, for harvest, for all the predicted effects of the plan. I do not envy your position. I too have submitted written testimony in the past adding to that numbers barrage but today I want to talk about another critical decision in the history of Oregon.

Oswald West and Tom McCall faced tremendous pressure from landowners, corporate hotel chains, and others hoping to develop the beaches of Oregon for private gain. Instead, West claimed the beaches for public use as highways and McCall later codified the public ownership into law. We look back and wholeheartedly believe they made the right decision. Their names are etched literally in stone and in our history books as a result of their courageous actions. Their actions became their legacies.

The decision you make on this HCP will be your legacy. I cannot guarantee your names will be etched in stone, but I hope our children and our grandchildren will someday read about the 2023 Board of Forestry members who chose to preserve some older growth forests for the marbled murrelets, for coastal martens, for clean drinking water, for restored salmon populations.

Please be steadfast. Please be courageous. Approve than a Habitat Conservation Plan we can all be proud of. Thank you.

My Name is Dr. Harriet Cooke, I'm a retired physician with a public health degree. I spoke on June 7th on behalf of myself, 350 PDX forest defense, congregation Havurah Shalom climate action team, and the Tikkun Olam committee of congregation P'nai Or.

This written testimony expounds on our position to urge you to **vote for a strong Habitat Conservation Plan for Western Oregon State Forests, one that is at least as protective as Conservation Alternative 3** which has been developed by leading scientists in fisheries, ecology, forestry, and representatives in the forest industry.

The current status of our fisheries, our climate, extinction of global species and the extensive and devastating fires we are experiencing, are testaments to the failure of past forest management and other land use practices to be sustainable for not only native salmon, but future generations of millions of species including humans.

As you know, salmon populations, now around 3% of historic levels, are closed to fishing due to record low numbers of fish and concern for their extinction in Oregon.

Oregon's historic timber harvest levels, clear cuts, and plantation management have contributed to our current crises and are not sustainable.

Plantations are greater mega-fire risks as well as do not support critical habitat needs for threatened and endangered species.

While even greater protections are needed, **Alternative 3 offers the minimal long-term protections** for clean water and healthy cool streams for salmon to survive, particularly in the face of climate change.

The fiscal and social needs of timber communities must be addressed and decoupled from timber harvest. Business as usual, particularly cutting old and mature trees, cutting trees on steep slopes, and cutting trees in riparian zones is not in anyone's best interest.

We need to shift our economic foundations from extraction to recovery projects, protection of communities from wildfires, and other human service jobs while we allow mature forests and fish populations to recover, if at all possible.

State forests make up only a small percentage of Oregon forests and need to become a model for improved, sustainable forestry practices.

In this time of climate change and massive species extinctions. We have been unable to cut human caused emissions anywhere near our goals, as we watch global temperatures rise and wildlife populations decline. Healthy mature forests have been shown to actually draw down water, and are critical for carbon sequestration.

Furthermore, contrary to the uproar by timber industries, NAOO analysis finds that under the previously agreed upon HCP, annual timber harvests may well increase due to greater compliance with the Endangered Species Act.

The loss of timber jobs is another myth, most timber jobs having been replaced by automation and exporting raw timber to less expensive milling options. In fact, timber jobs are a small fraction, 2-3%, of Western Oregon coastal economies.

We have an obligation to plan for the protection of watersheds, soils and climate now and for future generations.

Oregonians overwhelmingly support prioritizing fish and wildlife habitat, clean water, and recreation on state lands. A strong HCP protects Oregon's public lands legacy and economic diversity, including sustainable timber production.

**Thank You** for all of your work towards a strong Habitat Conservation Plan for Oregon State forests.

Harriet Cooke MD, MPH

On behalf of myself, 350 PDX Forest Defense Team, Congregation Havurah Shalom  
Climate Action Team, and P'nai Or Tikkun Olam Committee

**From:** [FORESTRY Boardof \\* ODF](#)  
**To:** [OLIVOS-ROOD Hilary \\* ODF](#)  
**Subject:** Fw: ODF Habitat Conservation Plan, agenda item #1  
**Date:** Tuesday, July 11, 2023 10:40:39 AM

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**From:** [REDACTED]  
**Sent:** Tuesday, June 20, 2023 10:54 PM  
**To:** FORESTRY Boardof \* ODF <boardofforestry@odf.oregon.gov>  
**Subject:** ODF Habitat Conservation Plan, agenda item #1

June 20, 2023  
Re: ODF Habitat Conservation Plan, agenda item #1

Chair Kelly, State Forester Mukumoto, and Members of the Board of Forestry:

My name is Gordon Culbertson. Our family owns and cares for three certified forest parcels in Lane and Douglas Counties of Oregon's coast range. In 2019 our family business Whitewater Forests LLC was recognized as the Oregon State Tree Farmers of the year. This award acknowledged our high standards for water quality, wildlife habitat, recreation, and sustainable harvest of commercial timber.

"ACTIVE MANAGEMENT" is the key to what we do. It assures our grandchildren will share the same rewards and values as the generations actively caring for our lands do today.

The view across the valley from one of our forest parcels in Lane County is land owned and managed by Oregon's Department of Forestry. In the summer of 1973, I was employed on a logging crew whose job was to harvest and deliver logs from these state lands to a local sawmill. As a result, from this state timber sale loggers and millworkers were paid a family wage, stumpage payments funded our local taxing districts providing education, law enforcement and social services. Today another forest is growing on that hillside and "environmentally friendly" finished wood products manufactured from the logs housed "baby boomer" families somewhere in America.

The "Habitat Conservation Plan" for Oregon State Forests as proposed in its current version is not a wise approach. During the early 1990s a similar management scheme; the "Northwest Forest Plan" was adopted to promote older forest habitat on Federal Forest lands. Harvest levels were slashed to a mere fraction, forest products jobs were lost, communities suffered, loss of revenue shared from forest harvests caused dramatic cuts in county services, harming lives of those in affected communities.

Today, more than thirty years later it may take an hour or more for a Deputy Sherriff to respond to an emergency in remote rural Lane County. The Sherriff's Department does a fine job with resources available but constrained funding will only be made much worse under this HCP proposal.

The Federal "hands off" management regime hasn't done the forest and its natural resources any favors either. Neglect has contributed to forest mortality and frustrated intervention to encourage forest health. Over **eighty percent** of acres burned by wildfires during the past two decades have occurred in these neglected federal forests. The investment in public roads used by recreationists has been squandered. A lack of resources and funding has caused roads to fall into disuse and disrepair, severely limiting emergency access.

**Mankind is part of nature's balance too. The price of "Northwest Forest Plan" was great, yet it accomplished few of the goals purported by its authors. Please consider the lessons of failed Federal Forest policy and don't rush headlong into this similar HCP.**

As a small woodland owner, we are concerned not only with the health of our communities, but also with the health and longevity of all forests, public and private. A secure and reliable forest industry is critical to use the logs harvested from our family forests. Oregon already has plenty of land reserved to protect wildlife and fisheries values in the Coast Range. Active management of State Forests is crucial to support a variety of societal and natural values. We urge the Board to reconsider this drastic HCP proposal and go back to the drawing board seeking a plan that will respect **all** the enduring values of **all** Oregonian's.

Sincerely,  
Gordon Culbertson  
Walterville, Oregon

**From:** Duane and Susan Dippon <[REDACTED]>  
**Sent:** Monday, June 5, 2023 8:44 PM  
**To:** FORESTRY Boardof \* ODF <[boardofforestry@odf.oregon.gov](mailto:boardofforestry@odf.oregon.gov)>  
**Subject:** Letter on behalf of STA and Board of Forestry open house

Dear Sir.

I was asked by the Sisters Trail Alliance to write you about my love of recreating in the Oregon forests you help manage. As a graduate of Oregon State' Forestry Department, I know that you have a tough job. I believe that you are doing your best and that you are applying the most appropriate science available to you. I applaud your efforts and thank you for periodically hosting public open houses. I want to be clear, as a participating member of the Sisters Trail Alliance I was not asked for my opinion on the statements being made by the head of STA. In my opinion, Scott is only speaking for himself.

Dr Duane R Dippon, class of 1981  
Sent from my iPhone

**From:** [REDACTED]  
**To:** [OLIVOS-ROOD Hilary \\* ODF](#)  
**Subject:** HCP Testimony  
**Date:** Wednesday, June 14, 2023 8:10:35 AM

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Greetings All,

Thanks for the opportunity to testify.

My wife Janice Gaines-Ehlen and I live in the Neahkahnie neighborhood on the North Oregon Coast. Like so many others, we've chosen to live in this incredible place where the forest meets the sea. We hike, mountain bike, surf, kayak fish the ocean, mushroom hunt, and paddle board the rivers and lakes. We've been avid anglers on the river systems of the Necanicum, Tillamook Bay and it's 5 rivers and especially our beloved Nehalem rivers for over 20 years. In that time we've seen notable changes of concern. The first notable change is the amount of returning chinook salmon. They've most certainly lessened in abundance and are smaller in size, even from 5 years ago. Another very obvious change is the rapid and accelerated silting in of the lower Nehalem Bay and tidal waters. The mud flats are rising, while the navigable channel continually narrows. This holds true as well for the mouth of the river and 1000 or so yards out into the ocean. Each year crossing the bar becomes more precarious. We're told this is substantially due to clearcutting practices too close to the rivers, streams and tributaries where earth is easily eroded on the steep mountain sides of the coast range.

Streams and rivers, without a well wooded buffer are of course more exposed to sun and thus heat up water to the extent that young salmonoids can't survive. Typical windfall and other natural protection then become unavailable to offer protection for our fish populations. Additionally, muddied and warmed waters impair oxygen levels needed for survival. We've seen algae take over river bottoms and the ecosystem we'd like to maintain including insects fish feed on...fade away.

Another area of concern is the spraying of herbicides and pesticides in and near our watersheds. This is a known unhealthy practice for not only our ecosystems but our own drinking water. These are a behaviors that can and should be changed and are well addressed in the strongest iteration of the Habitat Conservation Plan.

The salmon, steelhead and cutthroat of the Oregon coast have many challenges for survival: Global warming, overfishing, dams, water diversion for farming. There's chemicals from runoff, ocean acidification and the aforementioned logging practices and spraying.

For nearly two centuries our western forests have been harvested in an unsustainable profit driven manor. These days even more so, with automated logging, fewer employees, fewer mills, and shareholders far away with no skin in the game. Old growth forests are typically



replaced by mono-culture tree farm style woods, with a fraction of the diversity once known. Our old growth should be maintained and nurtured for many reasons: mitigation of global warming, sequestering of carbon, protection of water and species and so much more.

When considering the balance of jobs and businesses with the health of the environment we need to weigh all existing and potential commerce, along with the forestry products industry. Tourism, hikers, bikers, commercial and sport fisheries, guides, canneries, nature lovers, mushroom pickers, hunters, campers, woods recreators etc etc, and all the business's that support them from restaurants, and hotels, to farmers to the working trades. We all rely on keeping our ecosystem healthy and abundant. Healthy forests and waterways support and sustain us all! Let's work together to strike a balance so our cherished ecosystem lives on, long after we're gone.

There's a lot of local awareness and work being done to keep our environment healthy: The Lower Nehalem Community Trust and The North Coast Land Conservancy purchase and keep forested land and wetlands in perpetuity and are excellent stewards working to restore native species and clear invasives. Our watershed councils and volunteers do the same. Organizations such as Salmon Super Highway, Northwest Steelheaders, Save our Wild Salmon Coalition, Trout Unlimited, Wild Salmon are all working hard to maintain, enhance and bring awareness. ODF, ODFW, the Hatcheries, thousands of volunteers and many others are working hard to help sustain and enhance what we have left. But... there's lots of room for improvement. We encourage full adoption of Alternative 3 of the Habitat Conservation Plan. This well thought out plan is long overdue. Let's do it! HCP Alternative 3 makes sense.

All the best,

Mike

Mike Ehlen

Representative

PESCO Pragmatic Environmental Solutions Co. Inc.

1005 Industry Circle

Roanoke Virginia

24013 U.S.A.

Cell: [REDACTED]

email: [REDACTED]

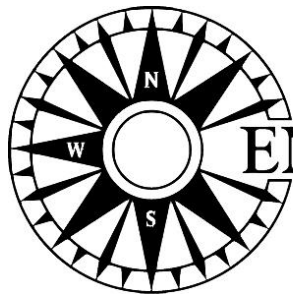
website: [www.pescova.co](http://www.pescova.co)

skype: Michael Casey Ehlen

All the best,

Mike

Mike Ehlen  
Representative  
PESCO Pragmatic Environmental Solutions Co. Inc.  
1005 Industry Circle  
Roanoke Virginia  
24013 U.S.A.  
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skype: Michael Casey Ehlen



# 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](http://www.englundmarine.com)

May 26th, 2023

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.

The loss of revenue to our counties from harvest cutbacks will be very detrimental to our communities. Services will have to be cut to offset the lost revenue. Less services leads to a lower quality of life.

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

Sincerely,

Kurt Englund  
Englund Marine & Industrial Supply

880 SE BAY BLVD  
NEWPORT, OR 97365  
(541) 265-9275

101 W WILSON  
PUBLIC BOAT LAUNCH  
WESTPORT, WA 98595  
(360) 268-9311

123 HOWERTON WAY  
MOORING BASIN  
ILWACO, WA 98624  
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91146 CAPE ARAGO HWY  
PO BOX 5704  
COOS BAY, OR 97420  
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201 CITIZENS DOCK RD  
CRESCENT CITY, CA 95531  
(707) 464-3230

#2 COMMERCIAL  
EUREKA, CA 95501  
(707) 444-9266

**From:** Christopher Farrar <[REDACTED]>  
**Sent:** Sunday, June 4, 2023 7:45 PM  
**To:** FORESTRY Board of \* ODF <[boardofforestry@odf.oregon.gov](mailto:boardofforestry@odf.oregon.gov)>  
**Subject:** Public Comment: BOF meeting June 7, 2023 Sisters OR

Dear Chair Kelly and Board Members,

Thank you for the opportunity to provide public comment on Agenda Item 1, specifically I am addressing the Draft Habitat Conservation Plan for Western Oregon State Forests. I strongly support finalizing and adopting the HCP with the strongest conservation alternatives to protect endangered species and provide greater certainty of timber harvests for decades to come.

To: Oregon Board of  
Forestry

3June2023

Forests  
County Resident

Subject: Draft Habitat Conservation Plan for Western Oregon State

From: Christopher Farrar, Clatsop

I implore the Board of Forestry to move expeditiously to approve and implement a strong Habitat Conservation Plan across Oregon's western State Forests. I live in Clatsop County on 28 acres of land zoned AF adjacent to State Forest land in the Astoria District. My wife and I purchased the forested land 13 years ago, never with the intention of logging it for timber. Instead, we have preserved this small piece of northwest Oregon coastal forest for wildlife habitat and hope it remains a refuge long after my death.

Neighboring properties to either side of this small refuge have been logged in the past ten years and a thinning operation was done a few years ago on State Forest land which borders our southern boundary. The tiny piece of forest I live in is a refuge but with few refugees. Wildlife is sparse in areas near human habitation. The transformation of wildland to urban or rural development conflicts with the needs of most species other than humans or domesticated species. In fact many people are downright hostile toward free living animals; poisoning, trapping, shooting, and harassing them to local disappearance and ultimately to extinction globally.

The loss of wildlife in diversity and numbers is terribly disheartening to me. We humans have the mental capacity to recognize our planet's biosphere is experiencing the Sixth Mass Extinction in the last 500 million years. The rate of extinction is accelerating across the plant and animal kingdoms and is brought on by careless human activities. Yet the focus remains on quick schemes to net financial gains with little attention to and no patience for preservation of values and assets that cannot be easily monetized. Oregon State Public Lands are places that can and should be managed in more thoughtful ways. Managed in ways that respect diversity of opinion on the meaning of Greatest Permanent Value; managed consistent with the best available science; not managed consistent for the greatest short term private business sector profit and revenue to counties and special districts. The Draft HCP strikes a balance between these two poles.

The Draft HCP took years of study, data analysis, complex modelling, meetings, public participation and testimony, and cost taxpayers significant expense. All sides were encouraged to participate and did. The draft HCP is a sound and fair plan. The plan is a compromise for protecting endangered species through habitat restoration and preservation while continuing to accommodate substantial annual timber harvests for the next 70 years.

I ask the Board of Forestry to not be moved by the delaying tactics of some who wish to derail implementing the HCP process but instead adopt a final HCP plan with the strongest conservation alternative as quickly as the process allows.

Sincerely,

*Christopher Farrar*

7 June 2023

To: Oregon Board of Forestry  
Oregon Department of Forestry  
2600 State Street  
Salem, OR 97310  
boardofforestry@odf.oregon.gov

Re: State Forest Habitat Conservation Plan

Board of Forestry:

I attended part of this morning's meeting in Sisters, Oregon, to hear the public comments regarding the proposed habitat conservation plan (the Plan) for our Oregon state forests. This letter is my written submission of comments on this topic.

The primary opposition to this plan, as presented by the public in this meeting, seems to be in these areas:

1. Loss of funding for rural communities and schools.
2. Loss of timber resources and related economic impacts.
3. Fear of fire.

The first two arguments may originate out of a fear of change. These arguments against the Plan are short-sighted and fail to consider long-term sustainability. Please consider:

1. As a dependable source of revenue for communities and schools, the sale of timber is a poor choice. Timber is a commodity that is price dependent upon international markets as well as local supply-and-demand markets.
2. The supply of timber that can be harvested from state forests varies by uncontrollable factors such as weather, climate, and disease.
3. The supply of timber is a finite resource. Renewable, but at a finite rate, limited by how fast it can grow. Demand may keep increasing, but harvesting will reach a limit, especially if it is to be sustainable.
4. The cost of harvesting timber varies by factors such as labor costs, automation that replaces workers, and transportation costs (diesel, tires, roads, truck drivers). All of these, and others, factor into whatever profit is available for local communities and schools.
5. A sustainable level of harvest has never been determined, in part because of the many variables that affect harvest. Over the long term, sustainability depends upon good soil, good climate, good moisture, and many other factors. Harvesting and other disturbances, such as fire and disease, affect how much area is available for the growth of timber and harvesting in the near decades.
6. Wildfire is a concern, especially in the WUI. It is also a natural part of ecosystem processes, and the extent of continued fire control practices is in debate.[1]

I utilize our state forests for hiking and other recreational activities, and I probably have purchased some timber products made with state forest timber. I am also in favor of education, as an educated person is one who has the greatest chance of a healthy and happy life, and who can contribute positively to society. I do believe that funding for Oregon schools must be removed from dependency on the timber economy and replaced with a source more responsive to the need for the service.

I am in favor of a state forest Plan that:

1. Plans for the long-term sustainability of the forest and the ecosystem.[5]
2. Acknowledges that change is happening. Change includes:
  - Climate
  - Economics
  - Societal, including population density and lifestyles
  - Use of state forest lands, such as recreational interests
3. Protects and conserves our public state lands for long-term use.
4. Protects and expands biodiversity.
5. Protects and expands areas with large and old trees, and old growth ecosystems.[4]
6. Participates in the national and global efforts to protect 30% of the land by 2030 and 50% of the land by 2050.
7. Participates in the national and global efforts to sequester carbon.

Our state forests have enormous value outside of the value of timber that can be harvested. That greater value lies in recreation, ecosystem services (clean air, clean water), tourism, and the intrinsic beauty and peace forests bring to the majority of people.

The Board of Forestry must create a plan that is radically different from the “business as usual” of the past many decades. The Plan must look forward many generations into the future, as well as beyond the borders of Oregon: International factors are significant in how we plan for the future of this state as well as our state forests. Economic and environmental factors are global in effect. Actions by you, the Board, can play a part in global efforts, and gain praise or condemnation, both in the present and the future.

Thank you.

/s/ Mathieu Federspiel  
Powell Butte, OR

- [1] D. A. DellaSala, B. C. Baker, C. T. Hanson, L. Ruediger, and W. Baker, “Have western USA fire suppression and megafire active management approaches become a contemporary Sisyphus?,” *Biological Conservation*, vol. 268, p. 109499, Apr. 2022, doi: [10.1016/j.biocon.2022.109499](https://doi.org/10.1016/j.biocon.2022.109499).
- [2] M. J. Kellett *et al.*, “Forest-clearing to create early-successional habitats: Questionable benefits, significant costs,” *Front. For. Glob. Change*, vol. 5, p. 1073677, Jan. 2023, doi: [10.3389/ffgc.2022.1073677](https://doi.org/10.3389/ffgc.2022.1073677).
- [3] Z. Kun *et al.*, “Recognizing the importance of unmanaged forests to mitigate climate change,” *GCB Bioenergy*, vol. 12, no. 12, pp. 1034–1035, Dec. 2020, doi: [10.1111/gcbb.12714](https://doi.org/10.1111/gcbb.12714).
- [4] B. E. Law, W. R. Moomaw, T. W. Hudiburg, W. H. Schlesinger, J. D. Sterman, and G. M. Woodwell, “Creating Strategic Reserves to Protect Forest Carbon and Reduce Biodiversity Losses in the United States,” *Land*, vol. 11, no. 5, p. 721, May 2022, doi: [10.3390/land11050721](https://doi.org/10.3390/land11050721).
- [5] “Seven Generation Sustainability.” [Online]. Available: [https://en.wikipedia.org/wiki/Seven\\_generation\\_sustainability](https://en.wikipedia.org/wiki/Seven_generation_sustainability)

**From:** Jane Freres [REDACTED]  
**Sent:** Tuesday, May 30, 2023 11:40 PM  
**To:** FORESTRY Board of \* ODF <[boardofforestry@odf.oregon.gov](mailto:boardofforestry@odf.oregon.gov)>; KELLY Jim \* ODF <[jim.kelly@odf.oregon.gov](mailto:jim.kelly@odf.oregon.gov)>; liz.Agpaooa@odf.oregongov <[liz.Agpaooa@odf.oregongov](mailto:liz.Agpaooa@odf.oregongov)>; JUSTICE Joe \* ODF <[joe.justice@odf.oregon.gov](mailto:joe.justice@odf.oregon.gov)>; MCCOMB Brenda \* ODF <[brenda.mccomb@odf.oregon.gov](mailto:brenda.mccomb@odf.oregon.gov)>  
**Cc:** Rob Freres <[REDACTED]>  
**Subject:** Testimony

ODF Board Support Office  
2600 State Street  
Salem, OR 97310

Reference: Testimony presented to the Board of Forestry June 7, 2023 in Sisters, Oregon.

Dear Board members,

My name is Robert Freres, Jr. I'm employed as President of Freres Lumber Co, Inc. in Lyons, OR.

In the thirty years following implementation of the Northwest Forest Plan, Oregonians have witnessed 60 timber dependent communities in Oregon and 70 timber dependent communities in Washington endure economic devastation from hundreds of mill closures and the social nightmares of suicide, divorce, spousal and child abuse, drug and alcohol addiction, homelessness and hunger resulting from the 90% reduction in timber harvests.

The Santiam Canyon where I grew up didn't have crisis centers and food banks until the N.W. Forest Plan debacle. I witnessed my neighbors and friends loss of jobs and homes and self respect. The social fabric of the Canyon was ripped apart.

The National Interagency Fire Center reports 11,326,644 acres have burned in the past two decades in Oregon. Probably one half of Oregon's 29 million acre have been destroyed by fire since the implementation of the the N.W. Forest Plan.

Oregonians have endured this failed experiment at conservation of a dynamic ecosystem and now the Board of Forestry is considering doubling down on the failure by approving the non-management of over one half of the lands controlled by the Department of Forestry for the next 70 years.

It's inconceivable to me that anyone who cares about Oregon, its environment and it's future would vote to approve the Habitat Conservation Plan under consideration.

The future is as certain as the past. Please do not repeat a monumental mistake.

Vote no against a Habitat Conservation Plan for Oregon's State Forests.

Sincerely,  
Robert Freres Jr.





# HAMPTON LUMBER

PO Box 2315  
Salem, Oregon 97308-2315  
Telephone 503.365.8400  
Fax 503.365.8900  
www.HamptonLumber.com

June 2, 2023

Via Email: [boardofforestry@odf.oregon.gov](mailto:boardofforestry@odf.oregon.gov)

ODF Board Support Office  
2600 State Street  
Salem, OR 97310

## **RE: June 2023 Board of Forestry Meeting Written Comments – Agenda Item 1**

Chair Kelly and Board of Forestry Members:

I am writing to reiterate our grave concerns that if the draft Western Oregon State Forest Habitat Conservation Plan (HCP) is approved this fall, the consequences will be detrimental to the forest sector, community services, and those who rely on timber revenue for their livelihoods. Even though the Oregon Department of Forestry (ODF) has chosen to prematurely implement the HCP through its revised Implementation Plans and Annual Operations Plans, there is still time for the Board of Forestry (Board) to alter the disastrous trajectory of this HCP.

In Fiscal Year 2022 (FY22), Hampton Lumber paid a total of \$26 million for volume purchased from ODF timber sales. To harvest, haul, and process that timber into wood products, we paid an additional \$36.5 million to local contractors and our employees. That means for every \$1 paid to ODF for timber sales, an additional \$1.41 was generated in local communities. If you apply that ratio to the \$97.3 million generated in FY22 from all ODF timber sales, an additional \$137.2 million was generated from logging, hauling, and processing activities. That is a significant economic impact and one that doesn't even include revenue generated from secondary manufacturers who turn state forest wood residuals into pulp, paper, particle board, and other products.

This economic activity cannot, and need not, be replaced with taxpayer dollars that are already in short supply and desperately needed for existing initiatives related to education, housing, healthcare and other critical services. Public services in local communities are already stretched thin. As you will read in the attached document, "News from the North Coast", communities are already facing less revenue, fewer employees and volunteers, and halted local services. Reduction in timber harvest and subsequent revenue will only exacerbate these challenges. With ODF implementing the draft HCP starting July 1, 2023, there will be 19% reduction in harvest volume and a 25% reduction in revenue for FY24 compared to FY23.<sup>1</sup> If 935 jobs<sup>2</sup> are indeed eliminated

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<sup>1</sup> <https://oregonforestry.wpengine.com/2023/04/25/forestry-department-invites-public-comment-on-state-forest-management-activities-3/>

<sup>2</sup> <https://oregonforests.org/economics>

as a result of this HCP<sup>3</sup>, the ripple effects go far beyond those individuals and their jobs. Please see the attached documents with more information on timber harvest volume financial impacts beyond reductions in direct revenue to ODF and counties.

I would be remiss to not acknowledge that 2023 is the 90th anniversary of the first Tillamook Burn wildfire and the 50th anniversary of Governor Tom McCall's dedication of the Tillamook State Forest and the Clatsop State Forest. Today these forests are thriving and productive, and support dozens of communities and thousands of workers. What will the next 50 years have in store? If this HCP is implemented as is, we fear the next 50 years will leave us with unhealthy forests, increased wildfires, and financial ruin for ODF and local communities.

We implore this Board and ODF take the time and effort to amend the draft HCP to increase harvest while achieving the original goals of this process – conservation and financial viability.

Respectfully,

A handwritten signature in black ink, appearing to read "Laura Wilkeson", with a long horizontal flourish extending to the right.

Laura Wilkeson  
State Forest Policy Director  
Hampton Lumber

cc:

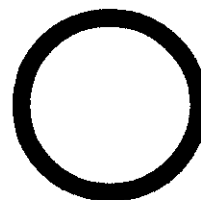
Cal Mukumoto, State Forester, Oregon Department of Forestry  
Geoff Huntington, Senior Natural Resource Advisor, Office of Governor Tina Kotek

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<sup>3</sup> <https://oregonforestry.wpengine.com/2023/02/03/public-comment-period-opens-for-proposed-state-forest-implementation-plans/>

**Clatsop County  
Proclamation  
Opposing  
Western HCP**





Clatsop County

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May 26, 2022

Dr. Kim Kratz  
Assistant Regional Administrator  
National Marine Fisheries Service  
1201 Northeast Lloyd  
Portland, OR 97232

Dr. Paul Henson  
Oregon State Supervisor  
U.S. Fish and Wildlife Services  
2600 SE 98<sup>th</sup> Avenue  
Portland, OR 97266

RE: Comments to the Draft Environmental Impact Statement for the Western Oregon State Forests Habitat Conservation Plan (Docket ID NOAA-NMFS-2021-0019)

Dear Dr. Kratz and Dr. Henson:

Clatsop County is a mission-driven organization that exists to support the safety, health and welfare of our rural community. Residents (and visitors) rely on the quality and relevance of our services and expect us to live within available resources. The County is girded by a Board of Commissioner adopted Strategic Plan and a Long-range Financial Plan that together provide a foundation of fiscal resiliency and stability. We are very concerned that decades of thoughtful fiscal planning will be undermined by significant and permanent reductions in County timber revenues with no reasonably viable opportunities to offset the loss. Given the challenges facing our community and the constraints of local government financing, the impacts on local governments must be a consideration/factor as the Habitat Conservation Plan (HCP) process moves forward.

While the Board of Commissioners supports the prospect and potential of an HCP, we feel strongly that any plan must fairly and equitably acknowledge and balance social, economic and environmental factors. The current draft dismisses legitimate and counterbalancing factors that must be considered for a plan to be supported by a broader community of interests.

From an equity lens, it is concerning that the financial burdens of the HCP squarely and exclusively fall on our relatively disadvantaged rural economies, governments, businesses and schools. Clatsop County has the highest rate of homelessness per 1,000 in the state of Oregon, inadequate mental health and addiction infrastructure, is defined as a childcare desert and is in the throes of

**11**

an affordable housing crisis. We need to retain every revenue at our disposable - not lose a projected \$2.6 million per year with limited options to replace.

Although, Clatsop County has the 13<sup>th</sup> lowest permanent tax rate of the 36 Oregon counties, we successfully provide a wide range of essential countywide services, including: law enforcement, jail, community corrections, juvenile, community development, public works, public health, district attorney and other general government functions. We are able to meet the needs of our community by augmenting property tax revenues with other discretionary and restricted revenues. The largest of the non-property tax discretionary revenue sources is timber revenues.

The five-year annual average of timber revenues (FY 16/17 to FY 20/21) received by the County is approximately \$8.6 million. These revenues are received into six funds, including General Fund, Rural Law Enforcement, Road District, Fairgrounds, Extension/4-H and State Timber Law Enforcement.

Table 1 depicts the average annual receipt of timber revenue over the five-year period of FY 16/17 to FY 20/21 by Fund.

TABLE 1

<b>Fund</b>	<b>Avg. Amount Received</b>	<b>Total</b>
<i>General Fund*</i>	\$5,180,000	
<i>Rural Law Enforcement</i>	\$1,241,000	
<i>Road District #1</i>	\$1,754,000	
<i>State Lands Enforcement</i>	\$217,000	
<i>Extension/4-H</i>	\$92,000	
<i>Fairgrounds</i>	\$86,000	
		<b>\$8,570,000</b>

\*General Fund represents discretionary revenues available to address traditional county services and Board priorities. The other Funds are special/restricted.

Although, the actual annual impacts of the draft HCP on taxing jurisdictions is difficult to model at this juncture, Table 2 depicts a scenario whereby the five-year average (FY 16/17 to FY 20/21) timber receipts are reduced by 30% per receiving Fund. The table also includes the corresponding annual % reduction in overall revenues for each Fund.

<b>Fund</b>	<b>Projected Annual Revenue Loss</b>	<b>% Reduction in Total Annual Fund Revenues</b>
-------------	--------------------------------------	--

General Fund	\$1,554,000	7%
Rural Law Enforcement	\$372,000	13%
Road District	\$526,000	13%
#1 State Lands	\$65,000	29%
Enforcement	\$28,000	6%
Extension/4-H	<u>\$26,000</u>	4%
Fairgrounds	\$2,570,000	

## 2 1 Page

In terms of financial and service ramifications, this level of revenue loss is materially unrecoverable without definitive and long-term financial intervention from the State of Oregon and will undeniably have long-lasting negative repercussions for service delivery and quality of life within our community. We are not being alarmist in this statement, but are realistic about the limited number of practical options available to replace this revenue loss without significant intervention and commitment from the state legislature.

This level of reduction will impact every part of our organization and community. It will degrade both services and staffing levels for generations to come - and occurs while we are fully engaged in addressing any number of community priorities per our strategic plan.

The projected impact of timber revenue reductions is unique for each receiving Fund. We describe these impacts in more detail below.

### General Fund Impacts

The backbone of the County's finances is the General Fund, which includes all the discretionary revenues of the County. Nearly 50% of the General Fund is expensed in Public Safety and Justice programs (i.e. Sheriff, Jail, Corrections, Juvenile and District Attorney) and the other 50% to General Government services including Elections, Assessment and Taxation, Community

Development, Budget and Finance, Building and Grounds, Information Technology, Human Resources, capital projects and other overhead functions. Roughly 90% of the General Fund is directed towards salary and benefits of employees.

By assuming 90% of the projected \$1,554,000 in projected revenue loss is directed to staff expenses, the County would need to reduce staffing levels by an estimated \$1,400,000. This would roughly equate to the elimination of 13.0 FTE. Based on current spending trends (50% Public Safety and Justice and 50% General Government), this would lead to a reduction of 6.5 FTE in both Public Safety and Justice and General Government respectively. Given our already lean staffing, this equates to an 8% reduction in General Fund staffing levels, which would materially impact public safety and many other services that are either statutorily required or overhead functions that provide essential services to operating departments. The other 10% of the reduction would come from reductions in various materials and supplies.

The County has limited options to replace this revenue loss without long-term legislative commitment. Other County resources are not available to backfill this revenue loss.

### Rural Law Enforcement Impacts

The Clatsop County Rural Law Enforcement District supports enhancements to the Sheriff's Office enforcement efforts by collecting and transferring revenues to fund approximately 55% of overall Sheriff Office enforcement related expenses. The two primary sources of revenue to this District are property taxes (55% of total revenues) and timber revenues (40% of total revenues). The projected annual reduction of \$372,000 will significantly undermine enforcement related staffing and jeopardize public safety and first responder response times. Up to 3.0 FTE would need to be reduced, with no ability for the General Fund to backfill, due to financial pressures also placed on the General Fund by reductions in timber revenues.

Between a potential 6.50 FTE reduction in the General Fund portion of the Public Safety and Justice budget and 3.0 FTE in Rural Law Enforcement - the total projected impact to Public Safety and Justice staffing levels is 9.5 FTE. This equates to a reduction in overall Public Safety and Justice staffing levels of nearly 8%.

It is worth noting that County public safety resources are already strained seasonally due to the impacts of tourism. With the population of the County more than doubling at various times -a reduction of staffing levels will put an immediate strain on all aspects of our public safety system and impact response times. This should be a concern for everyone (residents and visitors).

The only viable options to maintain public safety funding and service levels is for long-term state legislature investment. Other County resources are not available to backfill this revenue loss.

#### Road District #1 Impacts

Road District #1 is a County road district governed by the Board of Commissioners and receives revenues from a permanent property tax rate (56% of total revenues) and timber revenues (40% of total revenues). The projected annual reduction of \$526,000 (roughly 13% of revenues) will limit funds available for the maintenance and repair of roughly 232 miles of roadway in the County road system, including bridges, culverts and other infrastructure.

General Fund resources are statutorily prohibited for use on the County road system. Replacing the loss of timber revenues is unlikely. The material impact of the reduction is an extended horizon to capitalize larger maintenance/repair projects and potentially deferring certain activities. The County is currently maintaining the overall Road system at a Pavement Management Index (PMI) of 82 (very good condition) - but this may degrade over time with reduced funding. The lower the PMI, the more expensive to bring a road back to good condition through maintenance and repair.

#### Sheriff's Office - State Lands Enforcement

The Timber Revenue Law Enforcement Fund was created by Resolution of the Board of Commissioners in April 2002 pursuant to ORS 530.115(1). The special fund allows the County to retain 1% of forest trust land timber revenues specifically for law enforcement services in supervising protecting and enforcing the law on forest trust lands. Timber revenues is the sole funding source for this service. Revenues provide for a 1.0 FTE deputy, .3 FTE deputy for shift relief and a .1 FTE Sergeant for supervision (1.4 FTE total).

The projected annual reduction of \$65,000 (29% of total revenues) will materially impact the service level offered by this program, including ability to respond to an increase in illegal camping, illegal waste disposal and the associated risks of wildfire. With 75% of annual expenditures tied to salary and benefits a reduction in service level (staffing) is the only option for managing the Fund over the long-term. Due to the impacts of timber reductions in the General Fund and Rural Law Enforcement, other County resources are not available to backfill this revenue loss.



### Extension/4-H Impacts

The Clatsop County Extension District funds a partnership with Oregon State University Extension Services for the delivery of programs and services. Extension programs focus on 1) healthy

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communities and economies; 2) resilient and productive forestry, wildfire mitigation and education, and natural ecosystems (including ground and surface water); 3) sustainable agriculture, food systems and gardening; and 4) thriving youth, individuals and family (including 4-H). The projected reduction of \$28,000 (6% of total revenues) will impact resources available for programming and services in support of administrative staff, operational expenses (rent and utilities), program supplies and local travel reimbursement.

Other County resources are not available to backfill this revenue loss.

### Fairgrounds Impact

The Clatsop County Fair and Expo is a year-round facility that host the annual Clatsop County Fair and many other local and regional events. It also serves as a designated mass care site in the event of a natural disaster. The projected annual reduction of \$26,000 (4% of total revenues) will impact resources available for ongoing upkeep, maintenance and repair of the complex. Property Tax and timber revenues are the two most stable revenue sources, with the vast majority of others tied to rentals and activities. It is important to have the non-activity revenue sources as a hedge against future emergencies (i.e. pandemics) or other circumstances that may impact event revenue.

Other County resources are not available to backfill this revenue loss.

### Additional Impacts to Other Taxing Jurisdictions (Schools and Special Districts)

While we have projected the finance and service-level implications for Clatsop County, it is important to acknowledge other non-county taxing jurisdictions will be severely impacted by the draft HCP as well. In total, including the County projections already presented, the annual countywide impact of a 30% reduction in timber revenues is an estimated \$7.3 million for all local taxing jurisdictions combined (based on five-year annual average of \$24.2 million in timber revenues). This includes the roughly \$2.6 million attributed to Clatsop County taxing entities and \$4.7 million for K-12 schools, Clatsop Community College, rural fire districts, Port of Astoria, Clatsop Care Center and other special districts. As with the County, these entities have limited options to replace this revenue loss and will need a long-term state commitment to offset the loss.

### In Conclusion

The Clatsop County Board of Commissioners, Sheriff and District Attorney requests the HCP process fully consider the fiscal implications for local governments and the broader impacts on our community in terms of the loss of critical services, jobs, community safety, health and sustainability. In addition, the HCP should apply an equity lens - as placing the full burden of the

HCP on already economically challenged communities is not consistent with the State's commitment to equity in public policy and funding decisions.

Clatsop County cannot bear the burden of the draft HCP alone and asks for consideration to these factors and/or a commitment from the State to address the financial implications well before the impacts are felt locally.

We request the HCP process actively engage with local officials to develop a balanced plan that equitably considers and addresses economic, social and environmental factors. The goal is to have


5 1


a plan that can be supported by broad and diverse community interests and ultimately contributes to our long-term ability to finance and provide public services.


More discussion, collaboration and state commitments are needed before any version of the HCP moves forward.

  
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Mark Kujala, Chair

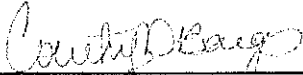
  
\_\_\_\_\_  
Matt Phillips, Sheriff

  
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Lianne Thompson, Vice-Chair

  
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Ron Brown, District Attorney

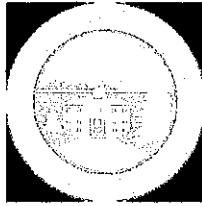
  
\_\_\_\_\_  
Jo Oyooka, Commissioner

  
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Pam Wev, Commissioner

  
\_\_\_\_\_  
Courtney Bangs, Commissioner

**Columbia  
County  
Proclamation  
Opposing  
Western HCP**





In the matter of opposing ODF's Current Western Habitat Conservation Plan

WHEREAS, The Columbia Board of Commissioners represents an estimated 53,588 citizens, many of whom are employed in the forest products industry.

WHEREAS, Columbia County includes 420,000 acres, of which 88% are forest land, and 10,000 are State Forest land. The forest sector is important to Columbia County's economy today and in the future. It is especially critical for the prosperity of rural Columbia County.

WHEREAS, Oregon Department of Forestry's Habitat Conservation Plan will significantly reduce the volume of timber harvested on state lands which will result in a reduction in jobs and timber harvest revenue in our community for 70 years or longer. Projections in the Environmental Impact Statement show an initial 28% reduction in state timber harvest.

WHEREAS, Columbia County receives more than \$2,000,000/year from State Timber Harvest Revenue. Columbia County schools, 911 Communications, Fire Districts, Jail Operations, etc are dependent on funding from timber harvest revenue.

WHEREAS, approximately 50% of timber harvested in Columbia County is milled in Columbia County's 3 wood processing facilities. Sawmills in Columbia County generate hundreds of millions of dollars in direct and indirect economic activity. These mills will be directly and indirectly impacted if this HCP is approved.

WHEREAS, Costs associated with public services, education, roads and bridges, housing, etc will most likely increase during the 70-year permit period. Reducing revenue that supports these services will greatly impact our way of life.

WHEREAS, the current Environmental Impact Statement does not estimate the impacts on indirect employment or wages in local communities.

WHEREAS, inaccurate numbers were used to project loss of jobs in the Environmental Impact Statement. The Environmental Impact Statement's modeling shows 3 jobs per million board feet of timber harvested. The Forest Products Industry standard uses 11-12 jobs per million board feet of timber harvested. ODF's Environmental Impact Statement only accounts for one quarter of the jobs in the Forest Product Industry.

WHEREAS, the crude discrepancy underestimates and undervalues the impact of the loss of jobs as well as the impact on local communities. Lane County's Forest Sector jobs pay 34% more than the average annual wage.

WHEREAS, The Oregon Board of Forestry and Oregon Department of Forestry will be in direct conflict of their obligation to the counties to manage forests for the 'greatest permanent value.'



**WHEREAS, The Oregon Board of Forestry and Oregon Department of Forestry is knowingly allowing this HCP to move forward using ODF's Forest Management Plan which has been proven in a court of law to be a failure. The court awarded \$1.1 billion to the counties suing the State and Board of Forestry for mismanagement of State timberlands.**

**WHEREAS, The Board of Forestry's decision to allow the Habitat Conservation Plan to move into the National Environmental Policy Act (NEPA) process without obtaining input and approval from the Council of Forest Trust Land Counties is appalling and needs to be addressed before moving forward.**

**WHEREAS, As projected in the Environmental Impact Statement for the Habitat Conservation Plan, harvest revenues will not cover Oregon department of Forestry's costs associated with this Habitat Conservation Plan. Taxpayers will be burdened with the expense of this plan, many of whom will also be looking for work. This is even more relevant when you add in the newest projection on the startling additional 34% reduction for timber harvest levels, inflation at 6% and rising, 7% PERS increases, \$111,000,000 average fire costs, harvest reduction from the Labor Day fires and the Private Forest Accord.**

**WHEREAS, It is deeply concerning that the Board of Forestry and Oregon Department of Forestry would pursue a plan that would lead to its own insolvency and hinder its mission and contractual obligations. The current HCP, if implemented, would amount to gross financial mismanagement.**

**WHEREAS, We find it alarming that wildfire is defined as a 'disturbance' in the Environmental Impact Statement.**

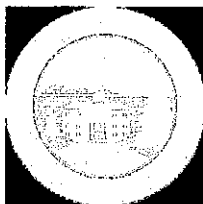
**WHEREAS, This type of 'disturbance' is known to be most severe in passively-managed forests. Fuel loads in passively managed forests are greater than in actively-managed forests, therefore forest fire poses a significant concern to areas surrounded by passively-managed forests.**

**WHEREAS, forest fires also impact other industries our community relies on for revenue and health of our residents. We've watched forest fires devastate rural communities around our state.**

**WHEREAS, Columbia County is surrounded by forests, we do not want to add more fuel to any possible fires.**

**WHEREAS, wildfires consume forests, kill wildlife, pollute our air, and damage waterways. The very animals the Habitat Conservation Plan is trying to protect are in greater danger in passively managed forests than a healthy actively-managed forest.**

**WHEREAS, this HCP will decimate Oregon's ability to make climate-friendly wood products- the only building material that actually stores carbon.**



**WHEREAS**, this HCP will impact our ability to make advanced wood products like CLT for building. Wood is the only renewable and sustainable building material. The cement industry contributes 5% of the world's emissions and the steel industry contributes 8%, whereas the Forest Products Industry uses wood which sequesters carbon and locks it up unless it burns.

**WHEREAS**, the drastic decrease of available timber will require us to import more of our wood products from other places that don't share our commitment to sustainability and will enlarge our carbon footprint.

**WHEREAS**, since the 1990's we've witnessed 90% of Federal timberland and hundreds of thousands of acres of State and Private timberland not being managed properly, in part due to the Endangered Species Act being used to protect habitat. We are now witnessing the unintended consequences which are an increase of severe wildfires, longer fire seasons, loss of wildlife, loss of habitat, polluting our air, destroying watersheds, all at an accelerating financial and environmental expense.

**WHEREAS**, studies show that the Northern Spotted Owl's population is steadily declining, despite other Habitat Conservation Plan's dedicated to protecting and improving its habitat. After decades of our forests being set aside to protect the habitat of the Northern Spotted Owl, we now know the greatest threat to the Northern Spotted Owl is forest fire and the Barred Owl, not the lack of habitat.

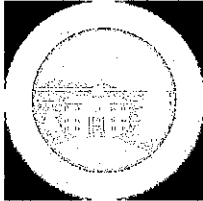
**WHEREAS**, the current Habitat Conservation Plan does not address the threat of the Barred Owl on the Northern Spotted Owl, nor does it estimate future population targets of the subject species. Our concern is that the Northern Spotted Owl and other species could be used to perpetuate Habitat Conservation Area's when the other issues are not being addressed.

**WHEREAS**, The Coho Salmon population in North Oregon Counties are at historic abundance levels and should be delisted. Coho's population has increased to the point that the Department of Fish and Wildlife is issuing permits to fish Coho.

**WHEREAS**, Riparian buffers allow unmanaged forests to grow which allows fuel loads to build. Coho are not being delisted because they live in buffered riparian zones, which increases fire danger zones. This action is in conflict and perpetuates the same results. The Habitat Conservation Plan does not resolve this issue.

**WHEREAS**, the benefits derived from this Habitat Conservation Plan, many of which are in dispute, do not justify the socioeconomic impact, environmental impacts, obligation of the state to manage forests for the greatest permanent value, and the loss of harvest revenue we depend on.

**WHEREAS**, the new harvest level projections under the current HCP are startlingly lower than anticipated which will exacerbate the loss of timber harvest revenue.



**THEREFORE, Columbia County Board of Commissioners resolve to oppose the current Western Habitat Conservation Plan which will have drastic direct and indirect impacts on residents, our community, and our environment.**

**Commissioner Casey Garrett**

**Council of  
Forest Trust  
Land Counties  
Letter opposing  
Western HCP**





## Council of Forest Trust Land Counties' Three Goal HCP Alternative

### PRELIMINARY MATTERS

The following is submitted by the Council of Forest Trust Land Counties (CFTLC) in response to a request for comments pursuant to the National Environmental Policy Act ("NEPA"). CFTLC is a committee of the Association of Oregon Counties (AOC). Although it reflects viewpoints of commissioners of its member counties, it has no authority to bind the County governments that participate in its deliberations. Any attempt to bind a participating county must be made by way of county board resolution or ordinance.

- Most of the Counties which are members of CFTLC participated as class members in County of Linn v. State of Oregon, Linn County Circuit Court Case No. 16V07708 ("the County class members"). They obtained a class wide judgment against the State that included future damages, and the future damages were calculated based on the assumption that the State would achieve certain harvest levels identified in the 2018 Business Case Analysis ("BCA") published by the Oregon Department of Forestry.
- Unless the Counties and the State reach a final settlement agreement that expressly provides to the contrary, the Counties believe that the State will be have additional contractual liability if and to the extent that future harvest levels fall short of the BCA projections that were used to determine calculate future damages at trial.
- This proposed alternative HCP which CFTLC is suggesting for further consideration and refinement is provided based solely on the assumption that the State will either pay the full amount of the outstanding judgment or reach a final settlement agreement with the Counties.
- Moreover, if the judgment against the State is, for whatever reason, reduced or modified in any respect by the appellate courts, the Counties expressly reserve their rights to pursue all claims and remedies against the State for any and all harvest levels that fall below the revenue maximization standard (or any other standard adopted by the appellate courts).

### Background

The Oregon Department of Forestry (ODF) has developed a draft Habitat Conservation Plan (HCP) for 638,000 acres of forest land managed by ODF. Most of these lands are State Forest Trust Lands that were transferred to the State by 15 Counties (the Counties).<sup>1</sup> Counties and Taxing Districts share 63.5% of the revenues from these lands, most of which come from commercial timber harvest.

The draft HCP proposes a set of "conservation strategies" designed to maintain and enhance habitat for a nine species of fish and seven terrestrial species, some of which are listed as threatened under the federal Endangered Species Act. As proposed, the HCP would result in a 70-year agreement with the US Fish and Wildlife Services and NOAA Fisheries (the Federal Agencies) under which ODF would not be prosecuted for incidental take of listed species.

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<sup>1</sup> Benton, Clackamas, Clatsop, Columbia, Coos, Douglas, Josephine, Klamath, Lane, Lincoln, Linn, Marion, Polk, Tillamook, and Washington Counties

## **Purpose and Need for A County Alternative**

ODF's proposed HCP would establish 275,000 acres of Habitat Conservation Areas (HCA) and 77,000 acres of Riparian Conservation Areas (RCAs). Some incidental harvest will be permitted in the HCAs, but by and large the HCAs and RCAs would be unavailable for timber management. Only about 291,000 acres would be left for sustainable timber harvest. As proposed, ODF's draft HCP would result in a number of unfavorable outcomes; including:

- Under ODF's draft HCP, timber harvest will drop over time from the current 260 MMbf to about 205 MMbf. The reduction in harvest means a reduction in timber revenues and jobs and further exposure to the State for breach of contract.
- ODF projects that its annual share of harvest revenues will fall short of its budget \$12 million in the short run, and that the deficit will climb to \$25 million per year in the long term. In the absence of Oregon General Fund support, ODF will have no choice but to reduce programmatic expenditures.
- Annual revenues shared with Counties and Taxing Districts will fall from about \$55 million to \$42 million, putting additional financial pressure on current levels of service and constituting a new breach of the contract that exists between the state and the counties.
- The draft HCP did not estimate impacts on employment or wages in local communities. We expect that the harvest reductions would affect 500 jobs in the timber industry, at least 150 jobs in the Counties and Taxing Districts, as well as a significant number of jobs at ODF.

ODF's draft HCP measures conservation outcomes of the HCP in terms of the number of acres of suitable habitat, and appears to assume that suitable habitat will increase under the conservation strategies.

The HCP, however, does not estimate future populations of the subject species. For the Northern Spotted Owl (NSO) this is a serious shortcoming. Studies show that NSO populations have been steadily declining, in spite of the fact that large acreages of federal, state and private land have been dedicated to improving habitat. It is now known that competition and predation from Barred Owls is the primary cause of the continued decline of the NSO.

Recent research shows that controlling the Barred Owl can stabilize and ultimately increase NSO populations. ODF's draft HCP recognizes that effect but does not make a hard commitment toward controlling Barred Owl populations (see Attachment A).

ODF's HCP also seeks to develop extensive acreage in the HCAs for Marbled Murrelet (MAMU) nesting habitat. MAMU populations in Oregon have stabilized and are increasing over the last few years. Even so, MAMU populations can be improved by controlling and limiting exposure to egg and fledgling predators.

CFTLC offers an alternative HCP subject to the conditions above, – the Three Goals Alternative<sup>2</sup> – that will improve the financial, economic and conservation outcome by:

- Making a commitment to immediate and long-term control of Barred Owls in NSO core areas and Corvids in MAMU nesting habitat.
- Increasing financial returns to Counties and Taxing Districts, and providing at least current levels of employment.
- Maintaining the financial viability of ODF.

In offering the Three Goals HCP Alternative, CFTLC does not necessarily believe that an HCP is required for ODF to manage the State Forest Trust Lands for the greatest permanent value as defined at the time these lands were established.

As the BOF and ODF appear resolved to enter into some kind of HCP agreement with the federal agencies, however, the Counties propose the Three Goals Alternative as an HCP alternative that offers better economic, financial, social and conservation outcomes than ODF's draft HCP.

### **Design Principles for the Three Goals HCP Alternative**

CFTLC's Three Goals HCP Alternative is designed under the following principles:

1. The State Forest Trust Lands should provide dependable, predictable levels of timber harvest to County and Taxing District beneficiaries in accordance with the contract that exists between the Counties and the State. Local economies will benefit from the family wage jobs provided by timber harvest and by revenue shared with the Counties and Taxing Districts.
2. Revenues derived from commercial timber harvest from the State forest Trust Lands should cover ODF's reasonable forest management costs.
3. Conservation strategies for listed species should represent the most cost-effective approach to meeting objectives.
4. Conservation objectives should include target populations as well as suitable habitat targets.
5. Funding for conservation should come from ODF's budget.
6. Oregon's State Forest Trust Lands should not be required to make a greater contribution to listed species than other State agencies or private landowners.

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<sup>2</sup> "Twin Goals" refers to the charge given to ODF by then Gov. Kitzhaber: Find a way to manage the State Forest Trust Lands that increases conservation and financial returns. Since that time, ODF has viewed the "twin goals" as encompassing only conservation and financial viability for the ODF. The Counties have not been given priority within that calculus. Thus CFTLC's proposal for a "Three Goals" approach.

7. An HCP for State Forest Lands should recognize the unique role that State Forests play in Oregon's forest sector.
8. An HCP for State Forest Trust Lands should recognize that under the federal Endangered Species Act, state and private land managers have no obligation to create habitat for species recovery.

### **Goals and Objectives**

ODF's draft HCP describes Goals focused on supporting the persistence of the covered fish and wildlife species. Measurable objectives are tied to each goal.

CFTLC's Three Goals HCP Alternative incorporates the same goals and most of the same species conservation objectives, as described in the conservation strategies below. In addition, the Alternative is designed to achieve the following economic and social goals:

1. Coupled with increases in suitable habitat, immediate and long-lasting competitor/predator control will allow regional NSO population trend to stabilize by increasing the population rate of change from -6.1%<sup>3</sup> to something greater than 0%.
2. Coupled with increases in suitable habitat, immediate and long-lasting predator control will allow MAMU populations to increase, if ocean conditions permit.
3. Sustainable levels of timber harvest will be sufficient to maintain payments to Counties as projected in ODF's 2018 Business Case Analysis (consistent with the jury verdict in *County of Linn v. State of Oregon*).
4. Sustainable levels of timber harvest will be sufficient to return revenue to Counties and Taxing Districts as projected in ODF's 2018 Business Case Analysis.
5. Sustainable levels of harvest will support current employment from forest management activities.

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<sup>3</sup> Across the Northwest Forest Plan area, the NSO population rate of decline was 3.8% from 1985 to 2013. Over the same time period, the rate of decline in the Oregon Coast Range was 5.1% (Dugger et al. 2016). Most recently (2002-2017), the rate of decline in The Oregon Coast Range has increased to 6.1% (Wiens 2020).

## The Importance of Population Modeling for NSO and MAMU

ODF's draft HCP measures progress toward species recovery by projecting and measuring suitable habitat. The implicit assumption is that suitable habitat is the primary factor affecting populations, and that creating additional suitable habitat will automatically buoy populations.

The current consensus of biologists studying the NSO, however, is that competition and predation from the Barred Owl has a larger impact on NSO population trends than does habitat conditions, and that without a reduction in Barred Owl populations, the NSO population will continue to decline regardless of the amount of suitable habitat. Predation also plays a significant role in MAMU population trends.

CFTLC's Three Goals Alternative addresses this dynamic head on by making an immediate and long-lasting commitment to predator control. This will allow NSO and MAMU populations to stabilize and, coupled with some level of additional habitat, populations can be expected to increase. In contrast, without predator control much of any new suitable habitat will likely be unoccupied by the species ODF seeks to protect.

The importance of competitor/predator control in recovering NSO and MAMU populations points to the need to evaluate HCP alternatives with population modeling, with suitable habitat, acreage being one of the inputs but not, in itself, the ultimate goal.

Population models for NSO and MAMU do exist and have been used to analyze long-term population trends under different forest management scenarios. While the initial NSO HCP developed by Washington State DNR in 1997 did not explicitly model population, the updated 2020 HCP reviewed NSO population dynamics modeling efforts and provided a novel matrix population stage model for MAMU<sup>4</sup>. In the final Environmental Impact Statement for its 2015 Resource Management Plan, The Bureau of Land Management adopted the USFWS parameterization of the HexSim model<sup>5</sup>, a spatially explicit framework for NSO population projections. These models use information about the spatial distribution of habitat over time, the current distribution of the subject species, and assumptions about competitors/predators.

Employing the currently available population models along with findings from USFWS recent Barred Owl control research<sup>6</sup> will yield an appropriate comparison between alternatives that employ different amounts of competitor/predator control and habitat development.

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<sup>4</sup> <https://www.dnr.wa.gov/programs-and-services/forest-practices/forest-practices-habitat-conservation-plan#FEIS>

<sup>5</sup> Schumaker, N.H. *et al.* Mapping sources, sinks, and connectivity using a simulation model of northern spotted owls. *Landscape Ecology*. DOI: [10.1007/s10980-014-0004-4](https://doi.org/10.1007/s10980-014-0004-4)

<sup>6</sup> Wiens, J.D., Dugger, K.M., Lesmeister, D.B., Dillione, K.E., and Simon, D.C., 2020, Effects of barred owl (*Strix varia*) removal on population demography of northern spotted owls (*Strix occidentalis caurina*) in Washington and Oregon—2019 annual report: U.S. Geological Survey Open-File Report 2020–1089, 19 p., <https://doi.org/10.3133/ofr20201089>.

## **Design Elements of CFTLC's Three Goals Alternative**

ODF's draft HCP identifies a set of conservation actions. The CFTLC's Three Goals HCP Alternative leaves many of the conservation strategies unchanged from ODF's draft HCP. Our approach as to each conservation action is set for below.

- **Conservation Action 1: Establish Riparian Conservation Areas**  
No changes
- **Conservation Action 2: Riparian Equipment Restriction Zones**  
No changes
- **Conservation Action 3: Stream Enhancement**  
No changes
- **Conservation Action 4: Remove or Modify Artificial Fish-Passage Barriers**  
No changes
- **Conservation Action 5: Standards for Road Improvement and Vacating**  
No changes
- **Conservation Action 6: Establish Habitat Conservation Areas**

The Barred Owl control proposed in CFTLC's Three Goals Alternative will provide a larger effect on the recovery of NSO populations than would the extensive HCA's proposed in ODF's draft HCP. The proposed HCA acreage, therefore, can be substantially reduced while still providing a superior outcome for these listed species.

Analysis with the population models will help establish the final HCA acreage for CFTLC's Three Goals Alternative. As a starting point, CFTLC proposes an HCA designation consistent with ODF's 2018 Business Case Analysis:

"Under an HCP, acres available for harvest are projected to increase [from] 51 percent to 63 percent of BOF forest lands."<sup>7</sup>

Using that target would make about 402,000 acres available for sustainable timber harvest, leaving about 236,000 acres in RCAs, HCAs and any other ODF no-harvest land allocations.

Our objective will be to ensure that the HCAs encompass most of the currently suitable habitat as well as lands most likely to become suitable habitat during the 70-year HCP term.

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<sup>7</sup> 2018, Oregon Department of Forestry, *Habitat Conservation Plan: A Business Case Analysis*, October 2018, page 40.

Specific HCA boundaries will be developed with assistance from ODF and the federal agencies.

- Conservation Action 7: Manage Habitat Conservation Areas

No changes

- Conservation Action 8: Conservation Actions Outside HCAs and RCAs

Outside the HCAs, ODF's draft HCP proposes rotations at culmination of mean annual increment (CMAI), claiming but not demonstrating social, environmental and economic benefits. CFTLC will need more information before proposing or approving such a policy.<sup>8</sup>

ODF's draft HCP also proposes a harvest schedule that departs from even flow. The draft HCP does not make clear the benefits of such a departure.

The dynamics between harvest flow and rotation ages can be best understood through use of ODF's timber harvest scheduling model. CFTLC experts look forward to working with ODF to do the analysis that will inform the design of CFTLC's Three Goals HCP Alternative on these points.

- Conservation Action 9: Strategic Terrestrial Species Conservation Actions

ODF's draft HCP mentions but does not make concrete commitment to competitor/predator control. In contrast, CFTLC's Three Goals Alternative differs in that it commits to immediate and long-lasting competitor/predator control as a tool for increasing the populations of NSO and MAMU.

Currently, NSO populations are declining at rates as high as 6.1% per year in the Coast Range, in spite of efforts to provide more suitable habitat on federal, state, and private lands in the region. The data reveal that competition and predation by Barred Owls outweighs the benefits of increasing suitable habitat.

Under the CFTLC's Three Goals Alternative, initial Barred Owl control efforts will reduce the Barred Owl occupancy rate by 14%<sup>9</sup> (to 81% occupancy). According to recent research, that could improve the current NSO population rate of change from -6.1% per year to as much as 3.3% per year<sup>10</sup>. Even reducing the Barred Owl population by 32% (to 65% occupancy) – the lower limit found from previous studies – could allow NSO populations to recover at rates up to 10% per year.

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<sup>8</sup> Demonstrating in the field that a stand has reached CMAI is difficult and time consuming, if it is even possible at all. Given the 70-year term of the HCP, and given the propensity of those opposed to commercial timber harvest to use an agency's own standards against them (e.g. the USFS "survey and manage" language), we strongly recommend ODF to revisit the CMAI language in the draft HCP and come up with a rotation age standard that is demonstrable and incontrovertible.

<sup>9</sup> Per Wiens *et al.* 2020, assumes current occupancy of 93%.

<sup>10</sup> Dugger, K.M., et al. 2016. The effects of habitat, climate, and Barred Owls on long-term demography of Northern Spotted Owls. *Ornithological Applications*. 118, 57-116. <http://dx.doi.org/10.1650/CONDOR-15-24.1>

Population monitoring studies from 2000 to 2017 indicate MAMU populations in Oregon are increasing, demonstrating positive trends between 1.4% and 3.7% in the species recovery zones that are wholly or partially within Oregon's borders. Key threats to the long-term maintenance of the species that are actionable in the terrestrial habitat include nesting habitat loss and ongoing nest predation associated with habitat fragmentation. Protection of suitable nesting habitat is a commonly applied conservation tool for MAMU, but reducing nest predation can also significantly affect MAMU population resiliency.<sup>11</sup> One study demonstrated corvids were responsible for nearly 33% of nest predation events in a Washington population, and a subsequent modeling exercise for MAMU in California found that reducing corvid predation by 60% could stabilize a local population.<sup>12</sup>

CFTLC's Three Goals HCP Alternative will contribute to maintaining a positive or stable population trend for MAMU by protecting the existing occupied habitat in the HCAs, spatially arranging HCAs to provide larger blocks of habitat over time as younger forest matures to fill in gaps, and by implementation of targeted actions to address fragmented areas that are currently experiencing high levels of nest predation. These actions could include relocating campgrounds currently within occupied habitat and deploying corvid control or conditioned taste aversion techniques in specific areas where removal of recreational facilities is not feasible.

Predictions of the actual population depends in part on the spatial arrangement of suitable habitat over time. Population models have been developed and used in other large-scale planning processes and should be used here to compare the outcomes of HCP alternatives in terms of the population of the NSO and MAMU.

- **Conservation Action 10: Seasonal Operations Restrictions**

No changes

- **Conservation Action 11: Road Construction and Management Measures**

No changes

- **Conservation Action 12: Establish and Maintain Conservation Fund**

Funding for predator control should come from ODF's share of harvest revenues. The additional harvest will be more than sufficient to cover the costs of predator control.

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<sup>11</sup> Marzluff, J. and E. Neatherlin. 2006. Corvid response to human settlements and campgrounds: Causes, consequences, and challenges for conservation. *Biological Conservation* 130: 301-314.

<sup>12</sup> Peery, M.Z., and R.W. Henry. 2010. Recovering marbled murrelets via corvid management: A population viability analysis approach. *Biological Conservation* 143(11): 2414-2424.



## **Next Steps**

Any HCP entered into by ODF will be comprehensive and complex plan that purports to guide management of the State Forest Trust Lands for a 70-year period. In this document, CFTLC outlines an alternative approach for managing these lands that should provide better conservation outcomes in terms of NSO and MAMU population recovery; more revenue to ODF, the Counties and the Taxing Districts; and support more jobs and income than ODF's draft HCP.

A complete specification of the CFTLC's Three Goals Alternative will require additional work. CFTLC hopes and expects to work shoulder-to-shoulder with ODF and the federal agencies to turn the ideas here into a full-fledged alternative. CFTLC, furthermore, stands ready to help ODF and the federal agencies develop and implement NSO and MAMU population models to fairly project the population impacts of the proposed HCP alternatives.

## Attachment A: Barred Owls Implicated in Northern Spotted Owl Decline

Wildlife biologists continue to refine our understanding of Northern Spotted Owl (NSO) population dynamics, and recent studies suggest that NSO recovery will require complementary strategies. When NSO was listed in 1993, loss of habitat was thought to be the biggest threat to the species' survival. The Northwest Forest Plan (NWFP) was adopted in 1994 by several agencies to resolve controversy over management of federal forestland<sup>1</sup> throughout the geographic range of NSO. The NWFP conferred some level of NSO protection on more than 20 million acres of federal land in Washington, Oregon and California. Despite receiving listed status and millions of acres of reserved habitat, the NSO population has steadily declined. **In this analysis, we contrast the influence of habitat availability versus the impact of competition from barred owls on the success of NSO. According to US Fish and Wildlife Service (US FWS) biologists, the barred owl is becoming a significant inhibitor of NSO recovery.**

Spotted owl populations were in decline prior to implementing the NWFP, so biologists expected that trend to continue while reserved habitat on federal lands re-grew the older forest structure NSO needs for successful breeding and foraging. Signs of NSO recovery should have begun to register within ten to 15 years after the timber harvest moratorium imposed by the NWFP, at least on federal lands with relatively larger initial NSO population. Across long-term study areas in all three states, however, NSO occupancy consistently decreased after 1994 (Figure 1, right), even accelerating in some locations due to habitat losses from wildfire<sup>2</sup>. Some of the continued decline was attributable to demographic trends, which take time to reverse, but the sustained decline is inconsistent with improving habitat.

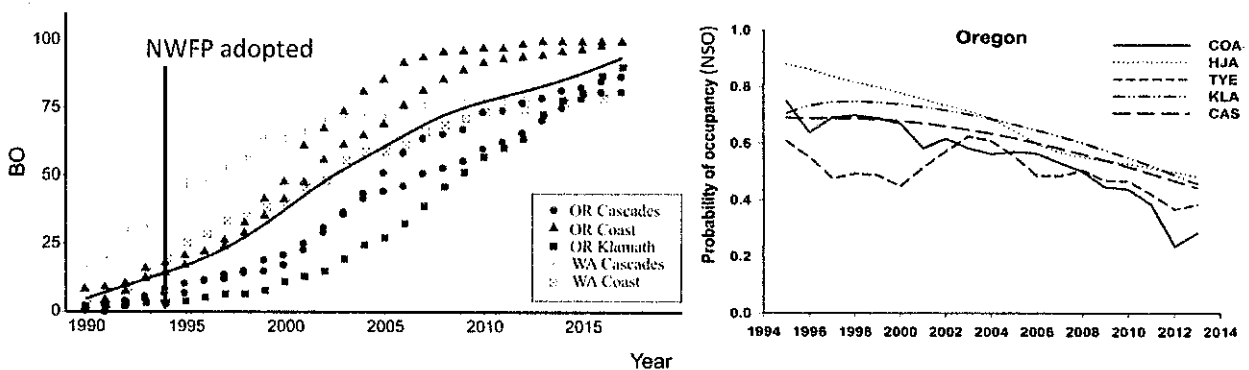


Figure 1. Trend in percent of NSO territories where at least one barred owl (BO) was detected each year (left), coinciding with sustained decline in NSO occupancy in suitable habitats (right). Adapted from Figure 2 in Jenkins et al. 2019 (left) and from Figure 8 in Dugger et al. 2019 (right).

The barred owl originated in eastern North America but gradually dispersed across the continent during the last century<sup>3</sup>. It is not known whether human activity facilitated barred owl range expansion. When intensive monitoring of NSO began under the NWFP, the number of NSO territories in which barred owls were present ranged from undetectable to around 20% of territories<sup>4</sup>. Now, barred owls are present on between 75% and 100% of NSO territories (Figure 1, left). This dramatic expansion coincided closely with

<sup>1</sup> <https://www.fs.fed.us/r6/reo/>

<sup>2</sup> Dugger et al 2016. <http://dx.doi.org/10.1650/CONDOR-15-24.1>

<sup>3</sup> Weins et al. 2019 <https://doi.org/10.3133/ofr20201089>

<sup>4</sup> Jenkins et al. 2019 <https://doi.org/10.1093/condor/duz055>

adoption of the NWFP. In the early 2000's, biologists hypothesized that NSO decline could be a result of habitat limitations, barred owl competition, or both, among other factors such as climate and fire<sup>5</sup>.

In 2016, the US FWS started experiments to remove barred owls from NSO habitat. Results from these removal experiments have been reported for sites in Cle Elum, WA, the Coast Range in OR, and the Klamath region in OR. At all three locations, barred owl removal appears to have stabilized NSO populations (Figure 2). In the Coast Range in OR, removals were relatively modest, reducing barred owl occupancy from 93% to 81%<sup>6</sup>, yet by 2019 the NSO population appears even to have started increasing (Figure 2). At the Cle Elum site in WA, barred owl occupancy was reduced by 40%, but NSO continued to decline in both treatment and control because wildfires reduced habitat availability on that site.

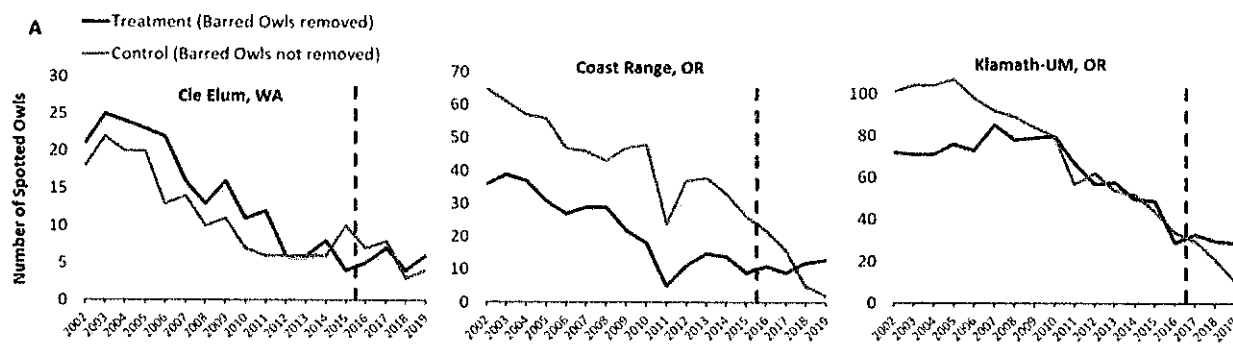


Figure 2. NSO populations stabilize after four years of sustained barred owl removal (red lines), whereas NSO populations continue to decline (blue lines) when barred owls are not removed. Adapted from Figure 6 in Weins et al. 2019.

While these barred owl removal experiments are still in their initial phase, early results suggest a promising management strategy to help restore NSO where suitable habitat already exists. Quality habitat with older forest structure is undoubtedly a critical requirement for NSO, but biologists now acknowledge the significance of the barred owl threat. We quote at length from a recent article<sup>7</sup> in which Jerry Franklin, one of the main originators of the NWFP and now Professor Emeritus at the University of Washington, discussed the Implications of barred owl competition and removal:

“The FWS’s Oregon office says that so far, removing barred owls in a given location stabilizes the spotted owl population there. No one has seen spotted owl recovery yet, but at least whacking the competition has stopped the decline. I think all of us really know what’s going on—there’s no future for the Northern Spotted Owl without such a program.” [In reference to the NWFP] “The people who devised the plan knew barred owls were out there. We just didn’t want to believe that the barred owl was going to be this much of a problem. ... We were wrong. We were doing wishful thinking.”

After decades of inexorable NSO decline, even with the advantage of 20 million acres of reserved habitat, barred owl removal may prove to be the management tool that can reverse the trend and help NSO back on the path to eventual recovery.

<sup>5</sup> Kelly and Forsman 2004. <https://academic.oup.com/auk/article-pdf/121/3/806/29688981/auk0806.pdf>

<sup>6</sup> Weins et al. 2019 <https://doi.org/10.3133/ofr20201089>

<sup>7</sup> <https://www.postalley.org/2021/01/16/parting-gift-trumpers-whack-the-northern-spotted-owl/>

## **Attachment B: Marbled Murrelet Status Brief**

The marbled murrelet (*Brachyramphus marmoratus*) is a small, long-lived seabird known for its unusual use of coastal old-growth forests as nesting habitat. Marbled murrelets typically nest on large, moss-covered branch platforms in coniferous trees. Nest trees are most often located in contiguous old-growth forest patches within 50 miles of the coast. Marbled murrelets typically produce one egg during an annual nesting attempt, and both parents raise the chick by foraging for small fish in nearshore marine areas and transporting the catch to the chick until it fledges.

The United States Fish and Wildlife Service (USFWS) listed the species as threatened under the federal Endangered Species Act in 1992 (Federal Register 50 CFR 17: 45328-45337) due to a combination of anthropogenic-based threats. The top two threats driving the listing decision were loss of nesting habitat primarily from commercial timber harvest and forest management, and poor reproductive success due to nest predation stemming from changes to the forest landscape that resulted in habitat fragmentation and greater edge effects. Additional threats were added during subsequent status reviews, most notably the destruction, modification, or curtailment of the marine environmental conditions needed to support marbled murrelets and their prey species. The species is also likely to be vulnerable to the increasing effects of climate change on Pacific northwest ecosystems including both the marine and forest habitat components.

Management commitments to aid the recovery of marbled murrelet have focused primarily on protecting suitable terrestrial habitat. The Recovery Plan (USFWS 1997) established six Conservation Zones which serve as recovery units in the contiguous United States. Within those zones, recovery actions described in the Recovery Plan focused on identifying and protecting habitat, including the marine environment. This was accomplished through implementation of the Northwest Forest Plan, the designation (Federal Register 50 CFR 17:26256-26320) and later revision (Federal Register 76 (193): 61599-61621) of critical habitat, and better use of existing laws and other methods to protect remaining habitat (e.g. HCPs). Recovery actions also focused on monitoring populations and habitat, implementing short-term actions to stabilize and increase the population (e.g. conserving large continuous blocks of habitat with buffers, reducing nest predation), and implementing long-term actions such as providing replacement habitat over time and improving marine habitat conditions that ultimately would reverse declining populations.

Conservation Zones 3 and 4, covering Oregon and northern California, account for 47% of the MAMU population in the contiguous U.S. Based on annual at-sea surveys, McIver et al. (2019) reported the annual rate of population change within Conservation Zones 3 and 4 between 2000 and 2017 as positive (1.4% and 3.7%). Over nearly the same period (2001-2017) the species demonstrated a decline of 3.0% in Conservation Zone 2 (Washington). In all six zones, McIver et al. (2019) reported an annual rate of change of 0.34% between 2001 and 2017. Therefore, as of 2017, the MAMU population was declining in Washington but not in Oregon or northern California.

### **Marbled Murrelet and the Western Oregon State Forests Habitat Conservation Plan**

Goal 6 of the Western Oregon State Forests Habitat Conservation Plan (HCP) (Sec 4.6.7, pg 4-18) seeks to support the persistence of marbled murrelet on the permit area. The HCP proposes to reach this goal through implementation of two objectives:

*Objective 6.1. Conserve, maintain, and enhance at least 15,000 acres of habitat where occupancy has been previously documented, or is modeled as suitable or highly suitable.*

*Objective 6.2. Increase the amount of suitable or highly suitable habitat by at least 80,000 acres in locations that increase interior forest and minimize hard-edge effects.*

The key component of the Terrestrial Conservation Strategy of the HCP intends to meet the two objectives and ultimately Goal 6 through the establishment of Habitat Conservation Areas (HCAs). As proposed, the HCAs cover a much larger area than the existing patches of occupied suitable marbled murrelet habitat. Over the 70-year-long permit term, protection of the HCAs will increase habitat quality and quantity for marbled murrelet in a passive manner, primarily by allowing the natural progression of forests from earlier seral stages to old growth during the permit period. Active management within the HCAs is also mentioned within the draft Conservation Strategy (Section 4, see Table 4-2 for a summary). Specific actions would include using silvicultural treatments to accelerate development of suitable habitat characteristics, but these are secondary to the establishment of the HCAs at the onset of the HCP permit term.

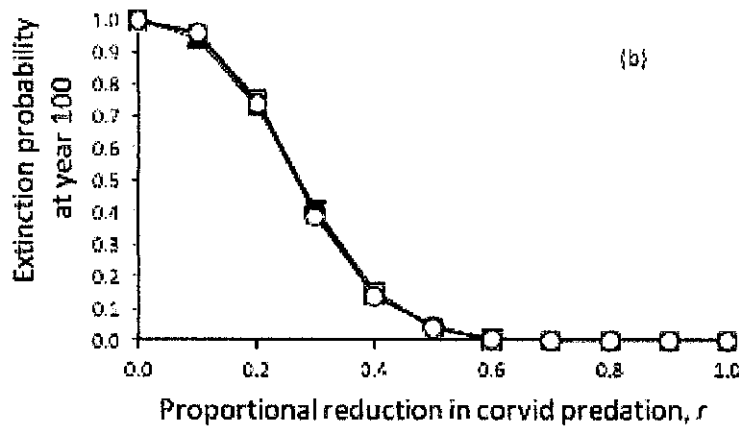
Effectiveness monitoring for Goal 6 of the HCP (see Chapter 6) would be completed by the Oregon Department of Forestry (ODF) every five years, focused primarily on habitat-based metrics (*e.g.* acres and spatial distribution of habitat by suitability category). Actual use of the habitat in the HCAs by marbled murrelet would not be assessed until 20 years into the permit term when ODF would collect data on nesting activity in the permit area.

### **An Opportunity to Directly Address the Threat of Nest Predation**

A potential downside of the HCP is its nearly exclusive reliance on terrestrial habitat conservation to offset the anticipated effects of the covered activities on marbled murrelet. In Oregon, at-sea monitoring indicated an increasing trend in the marbled murrelet population between 2012 and at least 2017 (McIver et al. 2019). The monitoring surveys indicated marbled murrelet populations were recovering in Conservation Zones 3 and 4 despite on-going habitat loss on non-federal lands. This increasing population trend suggests habitat availability is not the only key driver of the marbled murrelet population.

The Recovery Plan (USFWS 1997) noted corvid (*e.g.* jays, crows, and ravens) predation on nestlings and eggs can significantly impact marbled murrelet reproductive success and the more recent literature further develops our understanding of this threat. In California, Peery et al. (2004) found evidence that marbled murrelet reproductive success was limited by nest predation and other factors such as the quality of the marine food resource rather than availability of suitable nesting habitat. Later studies similarly demonstrated the importance of corvid nest predation on marbled murrelet reproductive success (Marzluff and Neatherlin 2006, Hébert and Golightly 2007). In a modeling exercise based on

California populations of marbled murrelet, Peery and Henry (2010) found a strong positive effect of corvid control on the marbled murrelet population when combined with sufficient habitat resources. Their modeling exercise demonstrated an extinction probability of zero for marbled murrelets once corvid predation was reduced by more than 60% (see Figure 5, below).



**Figure 5(b) from Peery and Henry (2010).**

More recent studies explored management techniques to behaviorally condition local populations of Steller's jays to avoid marbled murrelet eggs (Gabriel et al. 2012). The conditioned taste aversion (CTA) technique was effective in reducing corvid predation of marbled murrelet eggs in California and could be a useful tool in other parts of the range where Steller's jays are a key predator, including Oregon.

The positive effect of reducing nest predation on marbled murrelet population maintenance points to additional opportunities that could be more formally included in the HCP. There is a habitat quality component of the threat; corvids are associated with edge habitat and especially areas where habitat fragmentation is associated with human activity (Marzluff et al. 2004). While protecting occupied suitable habitat in the HCAs and buffering existing habitat with areas that will eventually develop into contiguous habitat blocks will likely reduce the impacts of habitat fragmentation over time, ODF could also consider actions specifically targeted at reducing nest predation. Those could include refining and more efficiently focusing HCAs in areas away from existing campsites or other recreational facilities that also support corvids, closing or relocating some recreational facilities to areas farther away from marbled murrelet habitat patches, and deploying corvid control or conditioned taste aversion techniques in specific areas where removal of recreational facilities is not feasible.

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# Council of Forest Trust Land Counties

1212 Court Street NE  
Salem, OR 97301

David Yamamoto Chair Commissioner Tillamook County	John Sweet Vice Chair Commissioner Coos County	Erin Skaar Position #1 Commissioner Tillamook County	Courtney Bangs Position #2 Commissioner Clatsop County	Margaret Magruder Position #3 Commissioner Columbia County	Will Tucker Position #4 Commissioner Linn County	Bob Main Position #5 Commissioner Coos County
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**To:** National Oceanic and Atmospheric Administration

**From:** Council of Forest Trust Land Counties

**Date:** May 31, 2022

**Comments on the Draft Environmental Impact Statement for the Western Oregon State Forest Habitat Conservation Plan, Docket NOAA-NMFS-2021-0019-0046**

**Addendum to # 11 in comment letter l3u-spff-cr6c submitted by the Council of Forest Trust Land Counties**

In our comment letter, the Council of Forest Trust Land Counties (CFTLC) stated in comment #11:

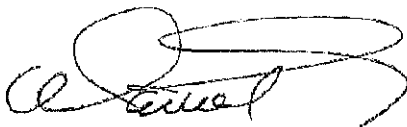
**The DEIS list of reasonably foreseeable trends and planned activities is inadequate.**

The list of reasonably foreseeable trends lacks the impact of the Private Forest Accord (PFA) on stream conditions in the planning area. The PFA was announced while the DEIS was under development and should have been considered in the analysis.

The list includes "changes in revenue distribution policy", but no change in revenue distribution is planned, or proposed. While a change in revenue distribution is legally possible, it is highly speculative. Including it as a reasonably foreseeable trend is counter to federal regulations.<sup>1</sup>

This addendum adds to comment #11 that **a change in the revenue distribution can only be made with the consent of the Counties and, therefore, should not be included in reasonably foreseeable trends.**

Respectfully submitted,



David Yamamoto, Chair  
Tillamook County Commissioner

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<sup>1</sup> 40 CFR §1502.15 requires environmental impacts statements describe 'reasonably foreseeable' trends and planned actions.





## Council of Forest Trust Land Counties

1212 Court St. NE | Salem, Oregon 97301

March 8, 2023, Board of Forestry Testimony

Chair Kelly, members of the Board of Forestry, State Forester Mukumoto, Staff: I am David Yamamoto, Tillamook County Commissioner and Chair of the Forest Trust Land Advisory Committee (FTLAC). I am here today representing FTLAC in order to fulfill our statutory responsibility to advise the BOF and the State Forester on matters which affect management of the State Forest Lands (ORS 526.156).

I thought it might be helpful to start with a little background of the Trust Counties.

FTLAC is made up of The Council of Forest Trust Land Counties. The Council of Forest Trust Land Counties is a formal organization made up of 15 counties in Oregon that have, within their borders, approximately 745,000 acres of forest land which the counties acquired through tax foreclosure, and which were turned over voluntarily to the State for timber management. Most of these lands were transferred to the State between 1939-1950.

The 15 counties in Council of Forest Trust Land Counties consist of: Clatsop, Tillamook, Lincoln, Lane, Douglas, Coos, Columbia, Clackamas, Washington, Polk, Marion, Benton, Linn, Josephine, and Klamath.

In the late 1930s, the wood products industry across the nation believed that value was in the trees and not in the land; the result of this belief created "cut and run" operations. When the trees were harvested, lands were abandoned, and counties would reclaim the land through tax foreclosure proceedings. Devastating fires in the 1930's and 1940's also laid waste to thousands of acres of timberland, which had also previously been abandoned, and were finally placed in county ownership. In December of 1936, the State Planning Board sent a report to Governor Charles Henry Martin (1935-1939) that over 1.7 million acres of timber and grazing lands were in county ownership through tax foreclosures. By 1939, that figure was 2,000,000 acres.

Not all the land became the State Forests, but many of them did since these lands were held in fee by the counties and generated no taxes. County governments had two options, they could sell the land and place the lands back on the tax rolls, or they could keep the lands as they were. As local governments were dependent upon property taxes for revenues, they were nearly bankrupt. The Counties then choose to turn the lands over to the state for management on their behalf.

We are again facing a budget crisis. This time at ODF and in the Counties because of the State Forest Lands. Reduced harvest from the lands due to decisions by this board and ODF continue to limit revenue generation beyond what is needed to maintain environmental quality. We believe ignoring ODF's budget planning is irresponsible and sets ODF on a path to failure. The State Forests Division is one of the state's few income generating programs. It is irresponsible to ignore ODF's budget and assume the general fund will make up the difference, especially as the state's Legislature faces difficult budget decisions this year, as it has in the past.

Not only will ODF suffer, but so too will the Counties. Oregon's rural Counties have limited resources. We would like to provide higher levels of service to our residents, but we cannot because of budget limitations. Even more than the Counties, special taxing districts will suffer a greater degree of issues. The financial impact to the Counties and Special Tax Districts of the projected 35% drop from recent harvest levels<sup>[1]</sup> will be catastrophic. It is undeniable that harvest levels under the Implementation Plan will result in layoffs of public service providers including police officers, teachers, social workers, and emergency services staff. In addition, workers in fully benefited family wage jobs in the timber industry and support services will lose their jobs at a time when no similar jobs exist in our rural Counties.

Board members, in your positions overseeing forest policy in Oregon, it is important to review in detail the information provided to you. If questions are unanswered or information is missing, it is important to fill those information gaps and not rely on assumptions. At the last BOF meeting and the recent FTLAC meeting, we heard about ODF's efforts to update the harvest model for the Forest Management Plan from the Implementation Plan version. We did not hear how those changes might affect revenue generation or other outcomes. At the last BOF meeting we also heard about the US Forest Service's lack of success in implementing adaptive management to support rural economic development. Nonetheless we heard from board members optimism for higher harvest levels in the future due both to new information and adaptive management.

The Counties want to be optimistic that the harvest levels in the Implementation Plan are a mistake. But we have no basis for being optimistic. ODF has not shown any evidence that the Implementation Plan modeling is inaccurate. If ODF expects modeling changes to result in significantly different harvest levels, why is the department pushing forward with the current Implementation Plan?

Further, why is ODF pushing forward with an Implementation Plan that goes beyond the policy direction of the BOF? While ODF reports that the purpose of the plan is to provide for the transition from current management to management under the HCP, ODF intends to implement the HCP prior to approval by the BOF. Chair Kelly, as you reminded us at the February 15<sup>th</sup> special board meeting, approval of the HCP is not guaranteed. If that is truly the case, how can ODF move to implement the HCP at the start of the next fiscal year? I believe ODF has the capability to develop an Implementation Plan that allows for continued management under the current Forest Management Plan until the BOF has approved the HCP. I believe this is what is required since the current Forest Management Plan is the currently approved policy of this board for providing Greatest Permanent Value. As drafted, I believe the Implementation Plan fails to comply with current policy and fails to provide Greatest Permanent Value.

Likewise, why is the board pushing forward with an HCP that patently fails the expressed twin goals of the board: increasing financial viability and increasing conservation outcomes. As I would have liked to express at the emergency board meeting, but could not because public comment was excluded, the fact that there was a need for an emergency board meeting indicates the failure of

ODF's planning. ODF failed to consider county revenue, and their own budget, when developing the HCP, and hence, failed to consider Greatest Permanent Value. ODF failed to perform the needed analysis to determine the needed extent of conservation under the ESA. As a result, ODF has created a plan that is catastrophic to Counties, special taxing districts, and workers.

It is also evident that it is unlikely to recover listed species. Barred owls are now the primary threat to northern spotted owls, but the plan does nothing to reduce barred owl populations. Instead, it sets aside hundreds of thousands of acres. Even so, this area is just a fraction of area set aside on National Forests which themselves have not recovered the spotted owl. How will ODF's set asides benefit the spotted owl when it appears when the National Forests' have not? As for the marbled murrelet, populations in Oregon are currently increasing. At the same time, ocean conditions are changing, hindering recovery. ODF has failed to show how the HCP will increase murrelet numbers beyond the increasing trend we are already seeing. And yet the board voted to continue with the current plan.

Turning back to the need for information, public comment is an important part of any public process and a way the public can provide needed information to the government. Limiting public comment limits the ability of the public to shape government policy. The BOF did not allow public comment at the February 15<sup>th</sup> meeting and has limited public comment today. I have heard the BOF comment on the crowded agendas at meetings. ORS 526.016 allows for additional meetings of the Board to occur. Perhaps instead of a crowded agenda with limited public testimony, additional meetings could be held so the public is allowed to engage in the process. I ask you to consider what is more important, giving the public an opportunity to speak to decision makers or maintaining a crowded agenda.

In addition to not allowing public comment, FTLAC members have concerns about the use of the February 15<sup>th</sup> Board of Forestry Meetings' use of an executive session. Executive session is legal for only narrow reasons. Use of executive session to avoid discussion of public matters is not allowed. The use of executive session at the February 15<sup>th</sup> special board meeting was poorly explained and does not inspire confidence in the board's process. Transparency is vital for a good public process. Inappropriate use of executive sessions is not transparent.

The situation at board meetings is, I fear, indicative of the entire forest management planning system used by ODF. ODF develops plans behind closed doors, with agencies that have no statutory interest in State Forest Lands. Then the department oversees a public comment period where comments are accepted but no meaningful changes to the plan are made as though the public has nothing to offer. ODF reports statistics around the numbers of meetings held and comments received, however to date, there have not been any meaningful changes made. ODF then deems the plan as incorporating public comment. As an elected official, I can tell you my constituents ask more of me. I ask more from you.

Good forest land planning requires considering a range of laws, understanding of financial costs, and clear-eyed assessment of possible outcomes. We ask you to change your approach to decision making and make these considerations when planning the future of the State Forests.

In 1978, State Forester Ed Schroeder began conversations with county officials suggesting a need for a regularly constituted group of county individuals to meeting with ODF on a working basis. He emphasized that a close working relationship between the 15 counties and his department would be of benefit to both. Let's go back to that partnership. One where ODF listens to the issues raised by Trust Counties and where the Board of Forestry engages with the counties. We all owe it to not only the Trust Counties but also the Trust County citizens that the partnership between ODF and the Trust Counties are beneficial.

Thank you and I am happy to answer any questions you might have.

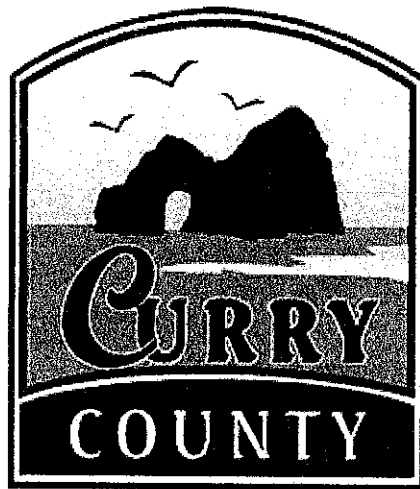
Respectfully Submitted,

David Yamamoto, Chair of the Forest Trust Lands Advisory Committee

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[1] The average harvest level from 2012 through 2021 was 255 MMbr/yr.

**Curry County  
Proclamation  
Opposing  
Western HCP**





**Curry County  
Board of Commissioners**

John Herzog, *Chair*  
Christopher Paasch, *Vice Chair*  
Court Boice, *Commissioner*

94235 Moore Street/Suite #122  
Gold Beach, OR 97444  
541-247-3296, 541-247-2718 Fax  
800-243-1996 [www.co.curry.or.us](http://www.co.curry.or.us)

## **CURRY COUNTY PROCLAMATION**

### **Opposition to Current Western Habitat Conservation Plan**

WHEREAS, The Curry County Board of Commissioners represents an estimated 24,000 citizens, many of whom are employed in the forest products industry.

WHEREAS, Oregon Department of Forestry's Habitat Conservation Plan will significantly reduce the volume of timber harvested on state lands which will result in a reduction in jobs and timber harvest revenue in our community.

WHEREAS, nearly 70% of Curry County land is forest land. A reduction in timber harvest revenue and jobs will have significantly negative impacts on our community.

WHEREAS, Sawmills in Curry generate hundreds of millions of dollars in direct and indirect economic activity. If implemented, this Habitat Conservation Plan will reduce log supply which jeopardizes entire communities, not just those who work directly in the forest sector.

WHEREAS, Costs associated with public services, education, housing, etc. will most likely increase during the 70-year permit period. Reducing revenue that supports these services will greatly impact our way of life.

WHEREAS, the current Environmental Impact Statement does not estimate the impacts on employment or wages in local communities.

WHEREAS, inaccurate numbers were used to project loss of jobs in the Environmental Impact Statement. The Environmental Impact Statement's modeling shows 3 jobs per million board feet of timber harvested. The Forest Products Industry standard uses 11-12 jobs per million board feet of timber harvested. ODF's Environmental Impact Statement only accounts for one quarter of the jobs in the Forest Product Industry.

WHEREAS, the crude discrepancy underestimates and undervalues the impact of the loss of jobs as well as the impact on local communities.

WHEREAS, The Oregon Board of Forestry and Oregon Department of Forestry will be in direct conflict of their obligation to the counties to manage forests for the 'greatest permanent value and reliable sustained yield'.

WHEREAS, The Oregon Board of Forestry and Oregon Department of Forestry is knowingly allowing this HCP to move forward using ODF's Forest Management Plan which has been proven in a court of law to be a failure. The court awarded \$1.1 billion to the counties suing the State and Board of Forestry for mismanagement of State timberlands while using the same Forest Management Plan as the HCP.

WHEREAS, The Board of Forestry's decision to allow the Habitat Conservation Plan to move into the National Environmental Policy Act (NEPA) process without obtaining input and approval from the Council of Forest Trust Land Counties is appalling and needs to be addressed before moving forward.

WHEREAS, As projected in the Environmental Impact Statement for the Habitat Conservation Plan, harvest revenues will not cover Oregon department of Forestry's costs associated with this Habitat Conservation Plan. Taxpayer's will be burdened with the expense of this plan, many of whom will also be looking for work.

WHEREAS, it is deeply concerning that the Board of Forestry and Oregon Department of Forestry would pursue a plan that would lead to its own insolvency and hinder its mission and contractual obligations. The current HCP, if implemented, would amount to gross financial mismanagement.

WHEREAS, we find it alarming that wildfire is defined as a 'disturbance' in the Environmental Impact Statement.

WHEREAS, this type of 'disturbance' is known to be most severe in passively-managed forests. Fuel loads in passively managed forests are greater than in actively managed forests, therefore forest fire poses a significant concern to areas surrounded by passively managed forests.

WHEREAS, forest fires also impact other industries our community relies on for revenue and health of our residents. We've watched forest fires devastate rural communities around our state.

WHEREAS, Curry County is surrounded by forests, we do not want to add more fuel to any possible fires.

WHEREAS, wildfires consume forests, kill wildlife, pollute our air, and damage waterways. The very animals the Habitat Conservation Plan is trying to protect are in greater danger in passively managed forest than a healthy actively managed forest.

WHEREAS, this HCP will decimate Oregon's ability to make climate-friendly wood products, the only building material that actually stores carbon.

WHEREAS, this HCP will impact our ability to make advanced wood products like CLT for building. Wood is the only renewable and sustainable building material. The cement industry contributes 5%

of the world's emissions and the steel industry contributes 8%, whereas the Forest Products Industry uses wood which sequesters carbon and locks it up unless it burns.

WHEREAS, the drastic decrease of available timber will require us to import more of our wood products from other places that don't share our commitment to sustainability and will enlarge our carbon footprint.

WHEREAS, since the 1990's we've witnessed 90% of Federal timberland and hundreds of thousands of acres of State and Private timberland not being managed properly, in part due to the Endangered Species Act being used to protect habitat. We are now witnessing the unintended consequences which are an increase of severe wildfires, longer fire seasons, loss of wildlife, loss of habitat, polluting our air, destroying watersheds, all at an accelerating financial and environmental expense.

WHEREAS, studies show that the Northern Spotted Owl's population is steadily declining, despite other Habitat Conservation Plan's dedicated to protecting and improving its habitat. After decades of our forests being set aside to protect the habitat of the Northern Spotted Owl, we now know the greatest threat to the Northern Spotted Owl is the Barred Owl not the lack of habitat.

WHEREAS, the current Habitat Conservation Plan does not address the threat of the Barred Owl on the Northern Spotted Owl, nor does it estimate future population targets of the subject species. Our concern is that the Northern Spotted Owl and other species could be used to perpetuate Habitat Conservation Area's when the other issues are not being addressed.

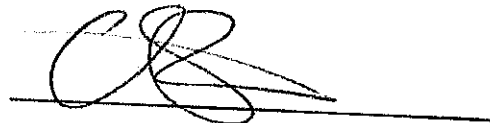
WHEREAS, the benefits derived from this Habitat Conservation Plan, many of which are in dispute, do not justify the socioeconomic impact, environmental impacts, obligation of the state to manage forests for the greatest permanent value, and the loss of harvest revenue we depend on.

THEREFORE, the Curry County Board of Commissioners resolve to oppose the current Western Habitat Conservation Plan which will have drastic direct and indirect impacts on residents, our community, and our environment.

Curry County Board of Commissioners

**Absent At Signing**

John Herzog, Chair



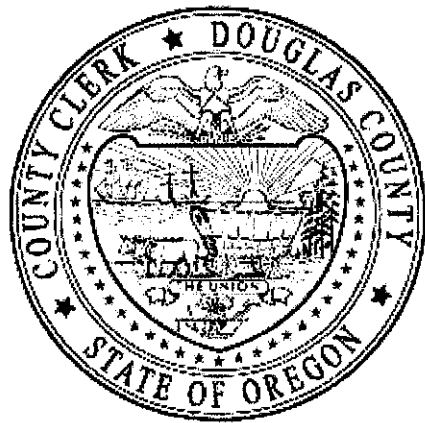
Christopher S. Paasch, Vice Chair



Court Boice, Commissioner



**Douglas County  
Proclamation  
Opposing  
Western HCP**



**BEFORE THE BOARD OF COMMISSIONERS OF DOUGLAS COUNTY**

DOUGLAS COUNTY OREGON

FILED

IN THE MATTER OF THE OPPOSITION TO

2022

OREGON DEPARTMENT OF FORESTRY'S (ODF)  
CURRENT WESTERN HABITAT CONSERVATION PLAN

RESOéGi4.P

DOUGLAS COUNTY CLERK

WHEREAS, The Douglas County Board of Commissioners represents an estimated 112,000 citizens, many of whom are employed in the forest products industry.

WHEREAS, Oregon Department of Forestry's Habitat Conservation Plan will significantly reduce the volume of timber harvested on state lands which will result in a reduction in jobs and timber harvest revenue in our community.

WHEREAS, A reduction in timber harvest revenue and jobs will have significantly negative impacts on our community.

WHEREAS, Sawmills in Douglas County generate hundreds of millions of dollars in direct and indirect economic activity. If implemented, this Habitat Conservation Plan will reduce log supply which jeopardizes entire communities, not just those who work directly in the forest sector.

WHEREAS, costs associated with public services, education, housing, etc. will most likely increase during the 70-year permit period. Reducing revenue that supports these services will greatly impact our way of life.

WHEREAS, the current Environmental Impact Statement does not estimate the impacts on employment or wages in local, rural communities.

WHEREAS, inaccurate numbers were used to project loss of jobs in the Environmental Impact Statement. The Environmental Impact Statement's modeling shows 3 jobs per million board feet of timber harvested. The Forest Products Industry standard uses 11-12 jobs per million board feet of timber harvested. ODF's Environmental Impact Statement only accounts for one quarter of the jobs in the Forest Product Industry.

WHEREAS, the crude discrepancy underestimates and undervalues the impact of the loss of jobs as well as the impact on local communities.

WHEREAS, as projected in the Environmental Impact Statement for the Habitat Conservation Plan, harvest revenues will not cover Oregon department of Forestry's costs associated with this Habitat Conservation Plan. Taxpayers will be burdened with the expense of this plan, many of whom will also be looking for work.

WHEREAS, it is deeply concerning that the Board of Forestry and Oregon Department of Forestry would pursue a plan that would lead to its own insolvency and hinder its mission and contractual obligations. The current HCP, if implemented, would amount to gross financial mismanagement.

06/22/2022

WHEREAS, we find it alarming that wildfire is defined as a 'disturbance' in the Environmental Impact Statement.

WHEREAS, this type of 'disturbance' is known to be most severe in passively-managed forests. Fuel loads in passively-managed forests are greater than in actively-managed forests, therefore forest fire a significant **concern** to areas surrounded by passively-managed forests.

WHEREAS, forest fires also impact other industries our community relies on for revenue and health of our residents. We have watched forest fires devastate rural communities around our state.

WHEREAS, Douglas County is largely forests, we do not want to add more fuel to any possible

WHEREAS, wildfires consume forests, kill wildlife, pollute our air, and damage waterways. The very animals the Habitat Conservation Plan is trying to protect are in greater danger in passively managed forest than a healthy actively managed forest.

WHEREAS, this HCP will impact our ability to make advanced wood products like CLT for building. Wood is the only renewable and sustainable building material. The cement industry contributes 5% of the world's emissions and the steel industry contributes 8%, whereas the Forest Products Industry uses wood which sequesters carbon and locks it up unless it burns.

WHEREAS, the drastic decrease of available timber will require us to import more of our wood products from other places that don't share our commitment to sustainability and will enlarge our carbon footprint.

WHEREAS, since the 1990's we have witnessed 90% of Federal timberland and hundreds of thousands of acres of State and Private timberland not being managed properly, in part due to the Endangered Species Act being used to protect habitat. We are now witnessing the unintended consequences which are an increase of severe wildfires, longer fire seasons, loss of wildlife, loss of habitat, polluting our air, destroying watersheds, all at an accelerating financial and environmental expense.

WHEREAS, studies show that the Northern Spotted Owl's population is steadily declining, despite other Habitat Conservation Plan's dedicated to protecting and improving its habitat. After decades of our forests being set aside to protect the habitat of the Northern Spotted Owl, we now know the greatest threat to the Northern Spotted Owl is the Barred Owl not the lack of habitat.

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WHEREAS, the benefits derived from this Habitat Conservation Plan, many of which are in dispute, do not justify the socioeconomic impact, environmental impacts, obligation of the state to manage forests for the greatest permanent value, and the loss of harvest revenue we depend on.

THEREFORE, Douglas County Board of Commissioners resolve to oppose the current Western Habitat Conservation Plan which will have drastic direct and indirect impacts on residents, our community, and our environment.

Dated this 22<sup>nd</sup> day of June 2022

~~DOUGLAS~~ DOUGLAS COUNTY BOARD OF COMMISSIONERS

BY

  
Chair Freeman

BY

  
Commissioner Boice

BY

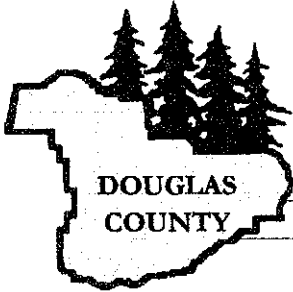
  
Commissioner Kress

APPROVED AS TO FORM

By

\_\_\_\_\_  
County Counsel

Date \_\_\_\_\_



**DOUGLAS COUNTY  
BOARD OF COMMISSIONERS**

**TIM FREEMAN    CHRIS BOICE    TOM KRESS**

1036 SE Douglas Ave., Room 217 → Roseburg, Oregon 97470

May 25, 2022

Dr. Kim Kratz  
Assistant Regional Administrator  
National Marine Fisheries Service  
1201 Northeast Lloyd  
Portland, OR 97232

Dr. Paul Henson  
Oregon State Supervisor  
U.S. Fish and Wildlife Service  
2600 SE 98th Avenue  
Portland, OR 97266

**Re:    Douglas County Comments for the Western Oregon State Forests Habitat Conservation Plan  
      (Docket ID NOAA-NMFS-2021-0019)**

Dear Dr. Kratz and Dr. Henson:

On behalf of the Douglas County Board of Commissioners, please accept the following comments on the draft environmental impact statement ("EIS") for the Western Oregon State Forests Habitat Conservation Plan ("HCP").

The Western Oregon State Forest HCP and the alternatives analyzed in the EIS present forest management proposals which will have drastic negative consequences on western Oregon forestry-dependent counties and communities while failing to benefit sensitive species. Douglas County especially will be significantly impacted if the HCP places harsh limits on active forest management, as is currently proposed. Of the five alternatives analyzed in the EIS only one, Alternative 5, would increase forest management, including timber harvest, above the level proposed in the HCP. Therefore, of the five alternatives Douglas County finds Alternative 5 the least onerous. That said, additional alternatives should be considered that would benefit both sensitive species and rural economies.

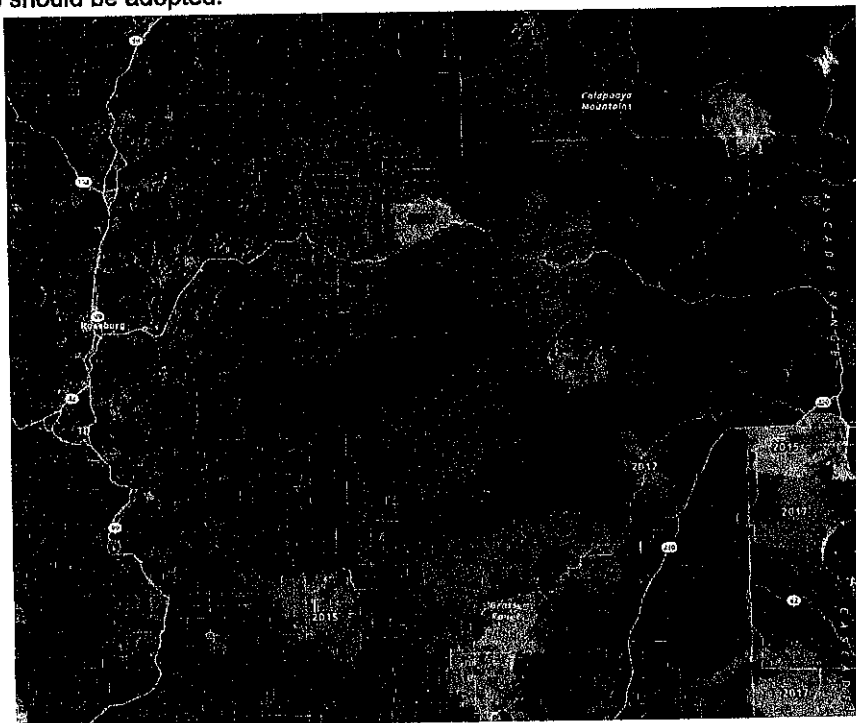
Douglas County is home to around 18 primary wood processing plants, which includes sawmills, plywood/veneer mills, engineered wood plants, and more. Altogether, these processing plants and other timber industry jobs directly employ around 5,500 individuals—an incredible 13 percent of the total employment in Douglas County. Thousands more jobs are indirectly supported by the forestry sector in Douglas County.

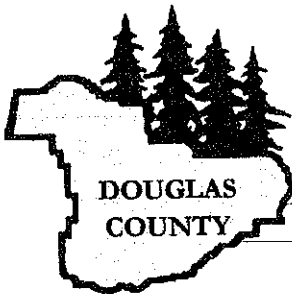
Douglas County's wood processing plants cannot rely on timber from Douglas County alone. These mills and processing plants purchase timber from across western Oregon, including from state forest lands, to support their operations. The timber market is competitive, and there is only a finite amount of timber available for sale at any given time. Events such as catastrophic wildfires, like those from 2020, constrain the timber market by limiting log supplies, possibly for half a century or more. Other legislative or administrative laws and rules also limit timber availability. The 1994 Northwest Forest Plan did just that, severely limiting active forest management and timber harvest on federal land in Oregon. Recently, the Oregon Private Forest Accord will limit timber harvest on private lands, further reducing timber availability. Altogether, the catastrophic wildfires which have plagued western Oregon as well as the legislative and administrative laws and rules which severely curtailed timber harvests have created a shrinking timber market, driving up the prices of wood products during this time of high inflation and limited affordable housing. Now, the State Forest HCP and alternatives in the EIS propose to limit log markets even more by taking half of western Oregon's state forests and making them off limits from active

forest management. Doing this will have significant, long lasting negative effects that will reverberate through western Oregon communities while also contributing to declining forest health and increasingly severe, and common, wildfires. In Douglas County, residents' livelihoods will be at risk as wood processing plants struggle to obtain enough timber to continue operating. This will have cascading impacts throughout the County, as limited wood availability impacts both forestry sector and non-forestry sector jobs in the County as well as county funding for schools, roads, community support facilities, and more. Therefore, additional alternatives to the proposed HCP need to be analyzed alternatives which would promote both economic and ecological health while benefiting western Oregon communities and sensitive species alike.

For decades Douglas County has been ground zero for the ongoing debate over forest management. The Spotted Owl endangered species designation, Northwest Forest Plan, Spotted Owl critical habitat designation, Wild and Scenic River designations, Elliot State Forest debacle, Oregon Coast Coho endangered species designation, and more have time and again dealt blows to the timber products industry in Douglas County, and for what? Today Douglas County suffers from a withered timber industry, the County's public forests have experienced increasingly catastrophic forest fires, Endangered Species Act ("ESA") listed species have had their habitat scorched, and once-thriving rural communities have literally gone up in smoke. For decades, Douglas County has been an active participant in the forest management debate, urging state and federal land management agencies, National Marine Fisheries Service ("NMFS"), and U.S. Fish and Wildlife Service ("USFWS") to recognize the importance of active forest management both to ESA-listed species and to rural Oregonians. For decades, the voice of Douglas County and many other rural Oregon counties and communities have been drowned out and ignored as out-of-touch groups and individuals have succeeded in the destruction of forest-dependent communities, patting themselves on the back while the very resources they sought to protect choke on the smoke created by their own "preservation" centric land management designations. Management of state and federal forests in western Oregon, and Douglas County specifically, has been nothing short of a failure and an insult. Something must give if NMFS, USFWS, and state land management agencies have any desire to actually assist ESA listed species and strengthen rural communities.

The eastern portion of Douglas County provides a snapshot of the result which should be expected to occur across Oregon state forest lands if the Oregon Department of Forestry's ("ODF") Habitat Conservation Plan ("HCP") should be adopted.





## DOUGLAS COUNTY BOARD OF COMMISSIONERS

**TIM FREEMAN    CHRIS BOICE    TOM KRESS**

1036 SE Douglas Ave., Room 217 → Roseburg, Oregon 97470

Depicted in the above image are some of the forest fires which have ravaged the County in little more than a decade. Driven by an inability to actively manage public forests due to ESA listings, critical habitat designations, and the Northwest Forest Plan, fuel loads have increased and forest health declined. Just in the last decade, the Douglas Complex Fire burned 48,679 acres to the north of Glendale while the Whiskey Fire burned 17,891 acres of federal forest in Douglas County. In 2015, the Stouts Creek Fire burned 26,452 acres. In 2017, the North Umpqua Complex Fires burned over 64,000 acres. In 2019, the Milepost 97 Fire burned 13,119 acres. During 2020, the Archie Creek Fire and Thielsen Fire collectively burned 141,517 acres. In 2021, fires in Douglas County burned another 140,000 acres, almost entirely on Federal land. These fires have burned communities, greatly degraded air quality, reduced available timber volumes, harmed timber products manufacturers, and devastated ESA-listed species. Today in Douglas County it is rare to see a green log leave public timberland, as nearly every harvested tree has already been burned. This will soon become the reality across Oregon state forests if "preservation" centric management designations prohibit active forest management.

Again, what has "preservation" centric forest management accomplished? Northern Spotted Owls ("NSO") have continued their decline, driven primarily from competition with Barred Owls while catastrophic forest fires are eliminating NSO habitat. See Jones et. al., *Megafire causes persistent loss of an old-forest species*, ZSL (May 9, 2021) <https://doi.org/10.1111/acv.12697>. In fact, it is recognized that the most realistic scenario is that Barred Owl competition and catastrophic wildfires driven by unhealthy forests will lead to the eventual extinction of the NSO. See Franklin et. al., *Range-wide declines of northern spotted owl populations in the Pacific Northwest: A meta-analysis*, Elsevier (July 2021) <https://doi.org/10.1016/j.biocon.2021.109168>. All in all, the benefits of this theory of forest management have gone up in smoke along with the timber it meant to protect.

ODF's HCP follows in the footsteps of the failed Northwest Forest Plan. It proposes to take 50 percent of Oregon's state forests and place them in habitat reserves off limits from active forest management, exacerbating the harms rural forest-dependent communities have suffered while simultaneously resulting in a \$24 million-dollar ODF budget shortfall. Meanwhile, species such as the NSO will see no benefit as their primary risk factors (Barred Owls and catastrophic fires) will not be addressed, and in fact will likely be worsened, as active forest management is taken out of the equation.

For too long Douglas County and much of western Oregon has gone unseen as rural communities' concerns about forest management have been ignored for nothing. Communities have even drafted their own proposals which would assist in the recovery of ESA-listed species while simultaneously permitting active forest management which would stimulate rural economic growth and wellbeing, only to have these proposals rejected without a second thought. The proposed action for the HCP is yet another insulting example of ODF, NMFS, and USFWS turning their backs on the plight of timber-dependent communities in favor of a failed policy. The draft Environmental Impact Statement ("EIS") simply illustrates this point, as the only "alternatives" considered do not address leading causes of ESA-listed species declines (catastrophic wildfire and predation) while also straying further from any possibility of active forest management that could make a meaningful positive difference to the ecological and economic health of rural Oregon.

The proposed action HCP and the listed alternatives are unacceptable policy-driven forest management proposals which would exacerbate wildfire risks, habitat loss, and harm to rural communities. Only Alternative Five proposes any type of harvest increase above the proposed action, but even it only proposes to add a small amount of acreage for harvest—a better option than the proposed action, but an option which still fails to address the real environmental and economic risks facing rural Oregon. Douglas County finds Alternative Five to be the least onerous of the alternatives examined in the EIS, and if one alternative were to be selected it should be Alternative Five. That said, to meaningfully protect ESA-listed species and rural communities alike ODF, NMFS, and USFWS need to go back to the drawing board on the HCP. This time, rural Oregon should be given a voice

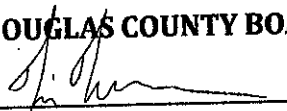
in the development of the HCP, not willfully ignored while "environmental" groups and interests cajole agencies into dismissing the actual needs of ESA-listed species, the forests, and timber-dependent communities.

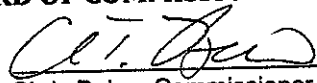
We strongly recommend that ODF, NMFS, and USFWS develop and adopt new alternatives to the HCP.

Please do not hesitate to contact us if you have questions or need more information.

Thank you,

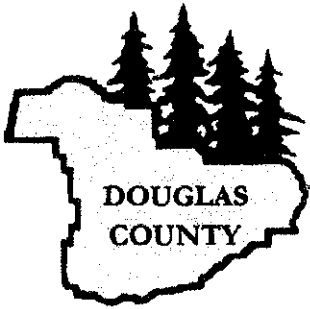
**DOUGLAS COUNTY BOARD OF COMMISSIONERS**

  
\_\_\_\_\_  
Tim Freeman, Chair

  
\_\_\_\_\_  
Chris Boice, Commissioner

  
\_\_\_\_\_  
Tom Kress, Commissioner





## DOUGLAS COUNTY COMMISSIONER TIM FREEMAN

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1036 SE Douglas Ave., Room 217 → Roseburg, Oregon 97470

March 9, 2023

Governor Kotek,

I would like to take this opportunity to share some thoughts and suggestions regarding the State's Habitat Conservation Plan now being developed by the Oregon Department of Forestry.

As you know the economy of Douglas County is highly dependent on the proper management of our timber resources from the Federal, State, County, and private forest lands. The new challenges of Covid recovery, homelessness, increased substance abuse, and providing adequate mental health treatment, combined with our obligation to provide basic public services have had a devastating impact on our County budget.

The snowmageddon event in 2019, the historic fires in 2020, and an increasing number of rules and regulations have restricted and reduced the timber volume available in the County for the harvest and conversion to lumber and new wood products like Laminated Veneer Lumber, and Cross Laminated Timber. It appears that the current direction of the HCP will further reduce timber volume and create new rules and regulations. Because it is designed to be in place for 70 years, I strongly urge you to slow the process, expand the examination of economic impacts, and increase the opportunity for input from local elected officials. Those who are going to be impacted by this plan should certainly have input in its development.

Thank you for your time and consideration.

Sincerely,

Tim Freeman  
Douglas County Commissioner

**Polk County  
Proclamation  
Opposing  
Western HCP**



**BEFORE THE BOARD OF COMMISSIONERS FOR  
POLK COUNTY, OREGON**

IN THE MATTER OF PROCLAIMING )  
POLK COUNTY'S OPPOSITION TO )  
OREGON DEPARTMENT OF )  
FORESTRY'S CURRENT WESTERN )  
HABITAT CONSERVATION PLAN )

**PROCLAMATION NO. 23-01**

WHEREAS, The Polk County Board of Commissioners represents an estimated 89,000 citizens, many of whom are employed in the forest products industry.

WHEREAS, Oregon Department of Forestry's Habitat Conservation Plan will significantly reduce the volume of timber harvested on state lands which will result in a reduction in jobs and timber harvest revenue in our community.

WHEREAS, 50% of Polk County land is forest land. A reduction in timber harvest revenue and jobs will have significantly negative impacts on our community.

WHEREAS, Wood products manufacturing supporting Polk County generate millions of dollars in direct and indirect economic activity. If implemented, this Habitat Conservation Plan will reduce log supply which jeopardizes entire communities, not just those who work directly in the forest sector.

WHEREAS, Costs associated with public services, education, housing, etc. will most likely increase during the 70-year permit period. Reducing revenue that supports these services will greatly impact our way of life.

WHEREAS, the current Environmental Impact Statement does not estimate the impacts on employment or wages in local communities.

WHEREAS, inaccurate numbers were used to project loss of jobs in the Environmental Impact Statement. The Environmental Impact Statement's modeling shows 3 jobs per million board feet of timber harvested. The Forest Products Industry standard uses 11-12 jobs per million board feet of timber harvested. ODF's Environmental Impact Statement only accounts for one quarter of the jobs in the Forest Product Industry.

WHEREAS, the crude discrepancy underestimates and undervalues the impact of the loss of jobs as well as the impact on local communities.

WHEREAS, The Oregon Board of Forestry and Oregon Department of Forestry will be in direct conflict of their obligation to the counties to manage forests for the 'greatest permanent value.'

WHEREAS, The Oregon Board of Forestry and Oregon Department of Forestry is knowingly allowing this HCP to move forward using ODF's Forest Management Plan which has been proven in a court of law to be a failure. The court awarded \$1.1 billion to the counties suing the State and Board of Forestry for mismanagement of State timberlands while using the same Forest Management Plan as the HCP.

WHEREAS, The Board of Forestry's decision to allow the Habitat Conservation Plan to move into the National Environmental Policy Act (NEPA) process without obtaining input and approval from the Council of Forest Trust Land Counties is appalling and needs to be addressed before moving forward.

WHEREAS, As projected in the Environmental Impact Statement for the Habitat Conservation Plan, harvest revenues will not cover Oregon department of Forestry's costs associated with this Habitat Conservation Plan. Taxpayer's will be burdened with the expense of this plan, many of whom will also be looking for work.

WHEREAS, It is deeply concerning that the Board of Forestry and Oregon Department of Forestry would pursue a plan that would lead to its own insolvency and hinder its mission and contractual obligations. The current HCP, if implemented, would amount to gross financial mismanagement.

WHEREAS, We find it alarming that wildfire is defined as a 'disturbance' in the Environmental Impact Statement.

WHEREAS, This type of 'disturbance' is known to be most severe in passively managed forests. Fuel loads in passively-managed forests are greater than in actively-managed forests, therefore forest fire poses a significant concern to areas surrounded by passively-managed forests.

WHEREAS, forest fires also impact other industries our community relies on for revenue and health of our residents. We've watched forest fires devastate rural communities around our state.

WHEREAS, Polk County is surrounded by forests, we do not want to add more fuel to any possible fires.

WHEREAS, wildfires consume forests, kill wildlife, pollute our air, and damage waterways. The very animals the Habitat Conservation Plan is trying to protect are in greater danger in passively-managed forest than a healthy activelymanaged forest.

WHEREAS, this HCP will decimate Oregon's ability to make climate-friendly wood products- the only building material that actually stores carbon.

WHEREAS, this HCP will impact our ability to make advanced wood products like CLT for building. Wood is the only renewable and sustainable building material. The cement industry contributes 5% of the world's emissions and the steel industry contributes 8%, whereas the Forest Products Industry uses wood which sequesters carbon and locks it up unless it burns.

WHEREAS, the drastic decrease of available timber will require us to import more of our wood products from other places that don't share our commitment to sustainability and will enlarge our carbon footprint.

WHEREAS, since the 1990's we've witnessed 90% of Federal timberland and hundreds of thousands of acres of State and Private timberland not being managed properly, in part due to the Endangered Species Act being used to protect habitat. We are now witnessing the unintended consequences which are an increase of severe wildfires, longer fire seasons, loss of wildlife, loss of habitat, polluting our air, destroying watersheds, all at an accelerating financial and environmental expense.

WHEREAS, studies show that the Northern Spotted Owl's population is steadily declining, despite other Habitat Conservation Plan's dedicated to protecting and improving its habitat. After decades of our forests being set aside to protect the habitat of the Northern Spotted Owl, we now know the greatest threat to the Northern Spotted Owl is the Barred Owl not the lack of habitat.

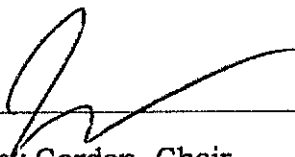
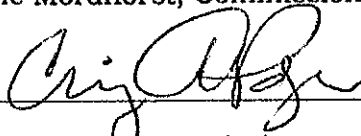
WHEREAS, the current Habitat Conservation Plan does not address the threat of the Barred Owl on the Northern Spotted Owl, nor does it estimate future population targets of the subject species. Our concern is that the Northern Spotted Owl and other species could be used to perpetuate Habitat Conservation Area's when the other issues are not being addressed.

WHEREAS, the benefits derived from this Habitat Conservation Plan, many of which are in dispute, do not justify the socioeconomic impact, environmental impacts, obligation of the state to manage forests for the greatest permanent value, and the loss of harvest revenue we depend on.

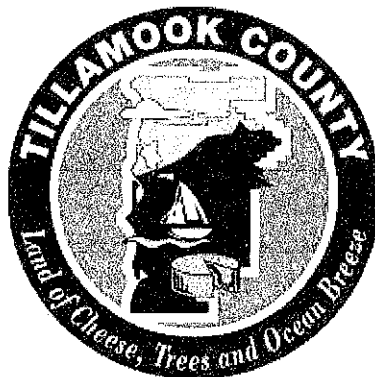
THEREFORE, Polk County Board of Commissioners resolve to oppose the current Western Habitat Conservation Plan which will have drastic direct and indirect impacts on residents, our community, and our environment.

Dated this 15<sup>th</sup> day of March, 2023

**POLK COUNTY BOARD OF COMMISSIONERS**

  
\_\_\_\_\_  
Jeremy Gordon, Chair  
\_\_\_\_\_  
Lyle Mordhorst, Commissioner  
\_\_\_\_\_  
Craig Pope, Commissioner

Tillamook  
County  
Proclamation  
Opposing  
Western HCP



**BEFORE THE BOARD OF COUNTY COMMISSIONERS  
FOR TILLAMOOK COUNTY, OREGON**

In the Matter of Concerns Regarding ) RESOLUTION  
the Oregon Department of Forestry ) **#R-22UØ**  
Western Habitat Conservation Plan in  
Tillamook County, Oregon

This matter came before the Tillamook County Board of Commissioners on July 6, 2022, at the request of Commissioner David Yamamoto. The Board of Commissioners, being fully apprised of the representations of the records and files herein, finds as follows:

1. In November of 2017 the Board of Forestry (BOF) directed staff in the Oregon Department of Forestry (ODF) to explore the pursuit of a habitat conservation plan, including creating a business case analysis to determine financial viability for the agency under such plan.
2. In November of 2018 ODF staff released a business case analysis showing that a habitat conservation plan would increase the acres available for harvest by 12% as opposed to without a habitat conservation plan in which the acres would be reduced by 6%. This information was used to move the process forward.
3. In February of 2022 ODF released the Western Oregon State Forests Habitat Conservation Plan Public Draft (HCP) and in March 2022 National Oceanic and Atmospheric Administration (NOAA) Fisheries released the Draft Environmental Impact Statement (EIS) for the HCP which propose placing thousands of acres into conservation areas unavailable for harvest for 70 years, with the opportunity to add more at the discretion of ODF.
4. In reviewing the HCP and the EIS the Tillamook County Board of Commissioners identified concerns relating potential local socioeconomic impacts of the actions contained in these documents.
5. Approximately 30% of Tillamook County's general fund budget is supported by timber harvest on the ODF State Forest Lands located in Tillamook County. State Forest Lands comprise 83% of the land in Tillamook County, precluding the



development of other property tax revenue and employment generating industries on those lands.

6. Costs associated with county-provided public services including education, housing, public safety, and hazard resiliency will only increase during the 70-year permit period. Committing to HCP directed harvest actions in the plan for 70 years will greatly impact our way of life and our ability to adapt to changing conditions.
7. The Tillamook County Board of Commissioners represents an estimated 27,000 citizens, many of whom are employed in the forest products industry. A reduction in timber harvest and jobs will have a significant impact on jobs and revenue in Tillamook County.
8. The EIS failed to include an informed and comprehensive assessment of the long-term societal impacts of the proposed HOP.

NOW, THEREFORE, IT IS HEREBY RESOLVED that:

9. The Tillamook County Board of Commissioners oppose the Western Habitat Conservation Plan, which will have drastic direct and indirect impacts on residents and our environment and threaten the long-term health and vitality of

our communities.


ATTEST: Tassi O'Neil  
County Clerk

DATED this 6<sup>th</sup> day of July, 2022.

THE BOARD OF  
COMMISSIONERS  
FOR TILLAMOOK COUNTY,  
OREGON

By:

  
\_\_\_\_\_  
Special Deputy

  
\_\_\_\_\_  
David Yamamoto, Chair

  
\_\_\_\_\_  
Erin D. Skaar, Vice-Chair

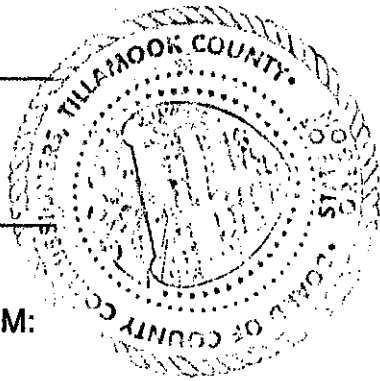
  
\_\_\_\_\_  
Mary Faith Bell, Commissioner

Aye Nay      Abstain/Absent

\_\_\_\_\_ / \_\_\_\_\_

✓ \_\_\_\_\_ / \_\_\_\_\_

8 \_\_\_\_\_ / \_\_\_\_\_



APPROVED AS TO FORM:

A handwritten signature in black ink, appearing to read "W. K. Sargent", is written over a horizontal line.

William K. Sargent, County Counsel

BEFORE THE BOARD OF COUNTY COMMISSIONERS  
FOR COLUMBIA COUNTY, OREGON

In the Matter of Opposing the )  
Oregon Department of Forestry Western ) Resolution No. 26 -2023  
Habitat Conservation Plan )

WHEREAS, in November of 2017 the Board of Forestry (BOF) directed staff in the Oregon Department of Forestry (ODF) to explore the pursuit of a habitat conservation plan, including creating a business case analysis to determine financial viability for the agency under such plan; and

WHEREAS, in November of 2018 ODF staff released a business case analysis showing that a habitat conservation plan would increase the acres available for harvest by 12% as opposed to without a habitat conservation plan in which the acres would be reduced by 6% and this information was used to move the process forward; and

WHEREAS, in February of 2022 ODF released the Western Oregon State Forests Habitat Conservation Plan Public Draft (HCP) and in March 2022 the National Oceanic and Atmospheric Administration (NOAA) Fisheries released the Draft Environmental Impact Statement (EIS) for the HCP which proposes placing thousands of acres into conservation areas unavailable for harvest for 70 years, with the opportunity to add more at the discretion of ODF; and

WHEREAS, in reviewing the HCP and the EIS the Columbia County Board of Commissioners identified concerns relating to potential local socioeconomic impacts of the actions contained in these documents; and

WHEREAS, Columbia County's general fund budget is supported by timber harvest on the ODF State Forest Lands located in Columbia County; and

WHEREAS, the HCP and draft EIS for the HCP would preclude the generation of other property tax revenue and employment generating industries on those lands; and

WHEREAS, costs associated with county-provided public services including education, housing, public safety, and hazard resiliency will only increase during the 70-year permit period; and

WHEREAS, committing to HCP directed harvest actions in the Plan for 70 years will limit the County's ability to adapt to changing conditions; and

WHEREAS, the Columbia County Board of Commissioners represents an estimated 53,000 citizens, some of whom are employed in the forest products industry; and

WHEREAS, a reduction in timber harvest and jobs will have an impact on jobs and revenue in Columbia County; and

WHEREAS, the EIS failed to include an informed and comprehensive assessment of the long-term societal impacts of the proposed HCP;

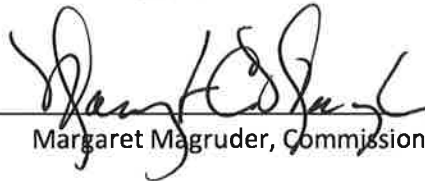
NOW, THEREFORE, IT IS HEREBY RESOLVED that the Columbia County Board of Commissioners oppose the Western Habitat Conservation Plan, which will have direct and indirect impacts on residents and our environment and threaten the long-term health and vitality of our communities.

Dated this 7 day of June, 2023.

BOARD OF COUNTY COMMISSIONERS  
FOR COLUMBIA COUNTY, OREGON

By:   
Casey Garrett, Chair

By:   
Kellie Jo Smith, Commissioner

By:   
Margaret Magruder, Commissioner

Approved as to form

By:   
Office of County Counsel

**STOP the HCP!**

**We, the undersigned,  
oppose Oregon  
Department of  
Forestry's Western  
Habitat Conservation  
Plan.**

**STOP the HCP!**

From: Jacob Meneou

notifications@mail.conversations.godaddy.com

Subject: New job form message for Oregon Stronger Together via

Oppose the Oregon Department of Forestry HCP

Date: May 25, 2023 at 1:30:29 PM

To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**

Jacob Meneou

**Email**

jacobmeneou@gmail.com

**Phone**

5642447016

**Address including county, and comments**

92218 svensen market drive Astoria Oregon 97103 Log  
truck driver

From: Michael Olson notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 25, 2023 at 1:33:53 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**  
Michael Olson

**Email**  
mike1538@yahoo.com

**Phone**  
5032988431

**Address including county, and comments**  
92218 Svensen Market rd Astoria or 97103

From: Brandt tarabochia  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 25, 2023 at 1:34:07 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**

Brandt tarabochia

**Email**

[brandttarabochia@gmail.com](mailto:brandttarabochia@gmail.com)

**Phone**

5037173313

**Address including county, and comments**

**Device**



From: Patrick loftis notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 25, 2023 at 1:37:04 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**

Patrick loftis

**Email**

Prloftis@gmail.com

**Phone**

5033606170

**Address including county, and comments**

**Device**

mobile

From: Patricia A Whiteside  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 25, 2023 at 12:03:56 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply in Conversation*

**Name**

Patricia A Whiteside

**Email**

pattiwhiteside@yahoo.com

**Phone**

5037911745

**Address including county, and comments**

From: Rick Kriege notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 25, 2023 at 8:43:32 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Rick Kriege

**Email**

rkriege@qwestoffice.net

**Phone**

5414192323

**Address including county, and comments**

Po Box 1290 Prineville, OR 97754

**Device**

From: Trisha Bongiorno  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 25, 2023 at 2:36:32 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Trisha Bongiorno

**Email**

[Trisharae13@gmail.com](mailto:Trisharae13@gmail.com)

**Phone**

[5037138276](tel:5037138276)

**Address including county, and comments**

20315 sw celebrity Ct Aloha, Or Washington County I  
had a feeling something was up with our forest and it

was so hard to find information because too many hands are in the pot. I'm so glad you were on the radio. Trust me I will be spreading the word!!! I'm a homegrown Oregon from a family who is homegrown and we love our forests and freedom! I will encourage donations as well!! Thank you and God bless you!

**Device**  
mobile

**Language**  
en-US

**Submitted\_from**  
Hcp petition

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From: Brian Bongiorno  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 25, 2023 at 2:58:09 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Brian Bongiorno

**Email**

brbongiorno@yahoo.com

**Phone**

5037299128

**Address including county, and comments**

20315 SW Celebrity Court, Aloha, Washington County,  
OR 97078

From: Larry Kirkpatrick  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 25, 2023 at 4:46:33 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Larry Kirkpatrick

**Email**

kirkpatricklogging@outlook.com

**Phone**

5419684350

**Address including county, and comments**

89769 Green Hill Eugene, Or. Lane Co. USA

From: Tanner Jackson  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 25, 2023 at 7:21:43 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**

Tanner Jackson

**Email**

tannerjackson365@gmail.com

**Phone**

5034402617

**Address including county, and comments**



From: Michelle Krantz  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 25, 2023 at 7:51:05 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**  
Michelle Krantz

**Email**  
thekrantzfam3@gmail.com

**Phone**  
5092805494

**Address including county, and comments**  
610 S. 16th St Philomath OR 97370

From: Joan Weaver notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 25, 2023 at 10:08:27 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**

Joan Weaver

**Email**

Lcreallkb@gmail.com

**Phone**

5417509466

**Address including county, and comments**

219 Grant Creek Rd. Eddyville, Or 97343 Lincoln  
County

From: Virginia Henley  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 23, 2023 at 7:11:18 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**  
Virginia Henley

**Email**  
Hello.Henley@gmail.com

**Phone**  
2098721928

**Address including county, and comments**  
353 NE LARCH PL REDMOND, OR 97756 Deschutes  
County

From: Katherine Baldwin  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 24, 2023 at 2:13:12 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**  
Katherine Baldwin

**Email**  
radical353@yahoo.com

**Phone**  
503.440.4237

**Address including county, and comments**  
Po Box 1092, Warrenton, Or. 97146 This will cripple  
alot of people if this passes

From: Mark Gustafson  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 24, 2023 at 2:52:37 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**

Mark Gustafson

**Email**

markgus967@msn.com

**Phone**

5033380873

**Address including county, and comments**

90424 M and M Rd. Astoria, Or-97103 Clatsop county

Do not initiate the HCP.

From: derik basel notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 24, 2023 at 1:50:20 PM  
To: Jen Hamaker jenhamaker1@gmail.com

---

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**

derik basel

**Email**

[derikbasel@gmail.com](mailto:derikbasel@gmail.com)

**Phone**

5034408346

**Address including county, and comments**

**Device**

desktop

From: Debra D Carole  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 23, 2023 at 8:31:32 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**  
Debra D Carole

**Email**  
debcarole1@msn.com

**Phone**  
15418418131

**Address including county, and comments**  
330 Effie St, Medford, OR, 97504

From: Morgan Crabtree  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 23, 2023 at 6:27:55 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Morgan Crabtree

**Email**

[mremington28@gmail.com](mailto:mremington28@gmail.com)

**Phone**

5033547593

**Address including county, and comments**

7400 S Prairie Rd Tillamook, OR 97141 Tillamook  
County



**Device**  
mobile

**Language**  
en-US

**Submitted\_from**  
Hcp petition

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From: Sherri Milling notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 23, 2023 at 9:43:47 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**  
Sherri Milling

**Email**  
Grandmathrice@gmail.com

**Phone**  
5035044514

**Address including county, and comments**  
14517 SW Elsinore Lane Hillsboro, or 97123

**Device**

From: Daniel Robertson  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 23, 2023 at 12:54:53 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Daniel Robertson

**Email**

danielrobertson46@gmail.com

**Phone**

5414045239

**Address including county, and comments**

62535 Catching Slough Rd. Coos Bay

From: STEVE WAYNE MORGAN  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 22, 2023 at 3:56:10 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**  
STEVE WAYNE MORGAN

**Email**  
msparky745@gmail.com

**Phone**  
15038121966

**Address including county, and comments**  
97141-3649

From: Jeffrey Elston notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 22, 2023 at 2:38:58 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Jeffrey Elston

**Email**

jeff.elston@outlook.com

**Phone**

5038770793

**Address including county, and comments**

3605 Forest Gale Dr.

**Device**

From: Mark Elston notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 22, 2023 at 2:40:40 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**

Mark Elston

**Email**

markelston@hamptonlumber.com

**Phone**

5039319260

**Address including county, and comments**

3111 Third Street Tillamook, OR. 97141 Tillamook

County This would destroy over 175 jobs at our  
Tillamook mill that relies on this renewable State

resource. We give thousands of dollars to our local community every year that will be lost along with hundreds more indirect jobs. Please formulate a better plan to save the Tillamook community and our infrastructure.

**Device**  
mobile

**Language**  
en-US

**Submitted\_from**  
Hcp petition

This message came from your contact form, [Oregon Stronger Together](#)

Download the Conversations mobile app for [iOS](#) or [Android](#), to access and respond to messages on the go

Sent via GoDaddy Websites + Marketing | Manage Emails

From: Cindy Bilodeau  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 22, 2023 at 3:13:23 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**  
Cindy Bilodeau

**Email**  
cindybilodeau903@gmail.com

**Phone**  
5034357515

**Address including county, and comments**  
14990 SE 1st Amity Oregon 97101 Save our timber  
jobs!!!



From: Glenda Lee notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 22, 2023 at 3:28:21 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**

Glenda Lee

**Email**

Relee500@hotmail.com

**Phone**

2087393832

**Address including county, and comments**

820 John day hwy vale oregon county of Malheur

**Device**

From: Jeremy McCarty  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 22, 2023 at 3:44:45 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Jeremy McCarty

**Email**

jeremymccarty98@yahoo.com

**Phone**

5033132879

**Address including county, and comments**  
610 Evergreen Dr Tillamook, OR 97141 Tillamook  
County

From: Cathy S Phillips  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 22, 2023 at 3:57:05 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Cathy S Phillips

**Email**

cflaughlin1@frontier.com

**Phone**

15036623551

**Address including county, and comments**

19625 NE Laughlin Road, Yamhill, Oregon 97148  
Yamhill County

From: julie morgan notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 22, 2023 at 3:55:17 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**  
julie morgan

**Email**  
[msparky745@gmail.com](mailto:msparky745@gmail.com)

**Phone**  
[5038425984](tel:5038425984)

**Address including county, and comments**  
707 MANOR PL

**Device**

From: Susan Shanafelt  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 22, 2023 at 4:09:55 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**  
Susan Shanafelt

**Email**  
susanshanafelt@hamptonlumber.com

**Phone**  
5035602204

**Address including county, and comments**  
PO Box 2315 Salem, OR 97308

From: Richard Rossavik  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 22, 2023 at 5:26:12 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**  
Richard Rossavik

**Email**  
rravik@reagan.com

**Phone**  
5036767369

**Address including county, and comments**  
51 NW Orchard Pl. Gresham, Oregon 97030

From: Jeremy Heesacker  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 22, 2023 at 5:17:45 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**

Jeremy Heesacker

**Email**

jeremyheesacker@hotmail.com

**Phone**

5034747466

**Address including county, and comments**

**Device**

From: Jessica notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 21, 2023 at 9:59:26 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**

Jessica

**Email**

Jessica97883@yahoo.com

**Phone**

9072992191

**Address including county, and comments**

**Device**

mobile



From: Susan Hawkins  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 22, 2023 at 5:03:16 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation:

**Name**  
Susan Hawkins

**Email**  
grama\_sue57@yahoo.com

**Phone**  
5037416455

**Address including county, and comments**  
91970 Koppisch Rd. Astoria, Oregon 97103

From: Nacole Johnson  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 21, 2023 at 9:47:37 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**  
Nacole Johnson

**Email**  
Njohnson7312@gmail.com

**Phone**  
5032988079

**Address including county, and comments**  
89754 Logan road Astoria, or 97103 Clatsop county

From: Mark Cosby notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 21, 2023 at 9:02:27 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**

Mark Cosby

**Email**

msc\_woodturning@yahoo.com

**Phone**

5419128282

**Address including county, and comments**

Don't bankrupt our counties... We should not be burning  
our resources at taxpayer expense and carbon pollution.  
We should utilize the natural resources in a sustainable

From: **Brian Wahlbom**  
notifications@mail.conversations.godaddy.com  
Subject: **New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP**  
Date: **May 21, 2023 at 8:33:49 PM**  
To: **Jen Hamaker jenhamaker1@gmail.com**

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Brian Wahlbom

**Email**

Bwahlbom@yahoo.com

**Phone**

5037916127

**Address including county, and comments**

Brian wahlbom 92989 maritime rd astoria oregon  
97103. Clatsop co

From: Melvin Lardy notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 21, 2023 at 7:55:50 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Melvin Lardy

**Email**

stumpbranchlogging75@gmail.com

**Phone**

5033138719

**Address including county, and comments**

323 park st Gaston or 97119

**Device**

From: Trudi Bonnichsen  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 21, 2023 at 7:38:59 AM  
To: Jen Hamaker jenhamaker1@gmail.com

---

# **Oregon Stronger Together has received a new message.**

Reply to Conversation

**Name**

Trudi Bonnichsen

**Email**

[Gregtrudi@gmail.com](mailto:Gregtrudi@gmail.com)

**Phone**

5415209147

**Address including county, and comments**

**Device**

mobile

**Language**

en-US

From: Luke notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 14, 2023 at 8:05:03 PM  
To: Oregon Stronger Together jenharnaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Luke

**Email**

[Loggerduke07@gmail.com](mailto:Loggerduke07@gmail.com)

**Phone**

[5038102855](tel:5038102855)

**Address including county, and comments**

55940 nw wilson river hwy gales creek,OR

**Device**

From: Mike smith notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 14, 2023 at 5:36:05 AM  
To: Oregon Stronger Together jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Mike smith

**Email**

Itsfishy2000@yahoo.com

**Phone**

3609206277

**Address including county, and comments**

92842 Donald marshall dr Astoria, oregon 97103



From: Carrie Doner notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 14, 2023 at 5:24:22 AM  
To: Oregon Stronger Together jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Carrie Doner

**Email**

Carriedoner@gmail.com

**Phone**

3602169551

**Address including county, and comments**

92072 Ferris Creek Rd Astoria, OR 97103 CLATSOP

**Device**

From: Angie Kunert notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 20, 2023 at 9:36:29 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Angie Kunert

**Email**

[Kunerts4@embarqmail.com](mailto:Kunerts4@embarqmail.com)

**Phone**

[5038156321](tel:5038156321)

**Address including county, and comments**

4445 Brickyard Road Tillamook OR 97141 Tillamook

From: Dave Byram notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 20, 2023 at 2:38:20 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**

Dave Byram

**Email**

DByram75@gmail.com

**Phone**

5414199567

**Address including county, and comments**

805 SW Hawthorne St. McMinnville, Or 97128

**Device**

From: Abby Walters notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 20, 2023 at 2:05:29 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**

Abby Walters

**Email**

[abby\\_vanderzanden@yahoo.com](mailto:abby_vanderzanden@yahoo.com)

**Phone**

5035306429

**Address including county, and comments**

2815 18th Ave. Forest Grove, OR 97116

**Device**

From: Cara Hughes notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 20, 2023 at 12:06:18 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Cara Hughes

**Email**

[cdhughes@live.com](mailto:cdhughes@live.com)

**Phone**

5419630593

**Address including county, and comments**

1806 26th St. Unit 93, La Grande, OR 97850, Union.

**Device**

From: Chuck Wiese notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 20, 2023 at 11:02:18 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**

Chuck Wiese

**Email**

[cfwiese@cs.com](mailto:cfwiese@cs.com)

**Phone**

5039399404

**Address including county, and comments**

1515 SW 66th Avenue Portland, OR 97225

**Device**

From: Michael Sears notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 20, 2023 at 10:50:17 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Michael Sears

**Email**

mikesears66@gmail.com

**Phone**

5039657736

**Address including county, and comments**

28475 Sandlake Rd. Cloverdale, OR 97112

**Device**

From: John Worden notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 20, 2023 at 10:13:08 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

John Worden

**Email**

johnroscoe817@gmail.com

**Phone**

5412187399

**Address including county, and comments**

415 A NW E Street Grants Pass, Josephine, Oregon



From: Randall E Holce  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 20, 2023 at 8:05:09 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Randall E Holce

**Email**

Reholce@msn.com

**Phone**

5034296783

**Address including county, and comments**

PO Box 127 Vernonia, Columbia, Oregon 97064

From: Sandra Dean notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 20, 2023 at 7:19:38 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Sandra Dean

**Email**

showell13@hotmail.com

**Phone**

5415195336

**Address including county, and comments**

P. O. BOX 4 Hereford, Oregon 97837

**Device**

From: Ray Driscoll notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 20, 2023 at 6:54:36 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Ray Driscoll

**Email**

wrtimber2011@gmail.com

**Phone**

5418912020

**Address including county, and comments**

26261 HIGHWAY 140 W

**Device**

From: Patrick d Larson  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 19, 2023 at 5:40:03 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**  
Patrick d Larson

**Email**  
Mmlpdl@gmail.com

**Phone**  
5033388581

**Address including county, and comments**  
39655 burnside loop Astoria or. 97103 Clatsop county

From: James Larson notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 19, 2023 at 5:29:37 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

James Larson

**Email**

Jamesplarson@yahoo.com

**Phone**

5037910940

**Address including county, and comments**

737 east harbor drive apt c Warrenton or. 97103 Clatsop  
county

From: Tyson notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 19, 2023 at 12:44:47 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Tyson

**Email**

Tysonmorris666@yahoo.com

**Phone**

3604314215

**Address including county, and comments**

**Device**

mobile

From: Bradley Pfeifer  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 19, 2023 at 11:32:06 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Bradley Pfeifer

**Email**

Oapfeifer@gmail.com

**Phone**

5038715179

**Address including county, and comments**

1030 12th Ave SW Albany OR Linn County

From: Christina Lee Smith  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 19, 2023 at 9:51:21 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Christina Lee Smith

**Email**

Crisylee@yahoo.com

**Phone**

5416609677

**Address including county, and comments**

1453 Westview Drive Grants Pass, Oregon 97527



From: Brian Segalla notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 19, 2023 at 7:38:05 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**

Brian Segalla

**Email**

Briansegalla@yahoo.com

**Phone**

5419776123

**Address including county, and comments**

11987 sw horny hollow trail, Terrebonne, Or 97760  
Jefferson county

From: Vicky Wood-Teeters  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 19, 2023 at 12:21:26 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Vicky Wood-Teeters

**Email**

[thevickster1000@gmail.com](mailto:thevickster1000@gmail.com)

**Phone**

[5034093983](tel:5034093983)

**Address including county, and comments**

1290 14th St SE Salem. Oregon 97302 Marion County

From: Nathan Webb notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 17, 2023 at 10:54:44 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**

Nathan Webb

**Email**

Kfgoosehunter@gmail.com

**Phone**

5416718383

**Address including county, and comments**

2937 Del Rio rd. Roseburg OR 97471

**Device**

From: Ron Cathcart notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 17, 2023 at 7:39:33 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Ron Cathcart

**Email**

cathcartron@aol.com

**Phone**

5037410193

**Address including county, and comments**

90013 HWY 202, Astoria OR 97103

**Device**

From: Charlene McBride  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 17, 2023 at 7:38:35 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Charlene McBride

**Email**

Charmcb@hotmail.com

**Phone**

5034409430

**Address including county, and comments**

92095 Youngs River Rd, Astoria, OR 97103 Clatsop  
County

From: Charlene McBride  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 17, 2023 at 7:37:07 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Charlene McBride

**Email**

Charmcb@hotmail.com

**Phone**

5034409430

**Address including county, and comments**

92095 Youngs River Rd, Astoria, OR 97103 Clatsop  
County

From: Darren E Carlson  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 17, 2023 at 7:36:49 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Darren E Carlson

**Email**

deklcarlson@hotmail.com

**Phone**

5034688126

**Address including county, and comments**

929 W Clatsop Ave

From: April Ford notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 17, 2023 at 6:18:15 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

April Ford

**Email**

appyluver85@gmail.com

**Phone**

13604312016

**Address including county, and comments**

72636 Elk Creek Rd Rainier, OR. 97048 Columbia  
County



From: Jason G. Karna  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 17, 2023 at 4:26:11 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Jason G. Karna

**Email**

jkarna@msn.com

**Phone**

5032988036

**Address including county, and comments**

33615 Adair ln. , Gearhart, OR..Clatsop county. Life  
long logger, and fisherman...current log truck driver.

From: Lee A Webb notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 17, 2023 at 3:51:15 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply in Conversation

**Name**

Lee A Webb

**Email**

elkcove6667@hotmail.com

**Phone**

5038129604

**Address including county, and comments**

**Device**

mobile

From: Jeana Broyles notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 17, 2023 at 3:36:17 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**

Jeana Broyles

**Email**

[j-faye@live.com](mailto:j-faye@live.com)

**Phone**

9719772749

**Address including county, and comments**

1950 Suppress Rd N Tillamook Oregon in Tillamook  
County

From: Lacy Sharpsteen  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 17, 2023 at 3:29:37 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**

Lacy Sharpsteen

**Email**

[Lacyj0316@gmail.com](mailto:Lacyj0316@gmail.com)

**Phone**

[3607015567](tel:3607015567)

**Address including county, and comments**

36565 Valley Vista Ln Astoria Or 97103 - Clatsop  
County

From: Cynthia Wenger  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 17, 2023 at 3:08:18 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Cynthia Wenger

**Email**

cynthiawenger74@gmail.com

**Phone**

5039510325

**Address including county, and comments**

3074 Oakcrest Dr. NW Salem, OR. 97304 Polk County

Standing against HCP

From: Cynthia Maker notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 17, 2023 at 2:56:27 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**  
Cynthia Maker

**Email**  
cindyloohoo39@gmail.com

**Phone**  
9717576187

**Address including county, and comments**  
604 1/2 Matzen St.

From: Debra Janssen

notifications@mail.conversations.godaddy.com

Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP

Date: May 17, 2023 at 11:13:29 AM

To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Debra Janssen

**Email**

mitosis\_frugal\_0h@icloud.com

**Phone**

4084108213

**Address including county, and comments**

54218 Kalberer Rd Scappoose, OR 97056

From: Debra Janssen  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 17, 2023 at 11:13:29 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Debra Janssen

**Email**

mitosis\_frugal\_0h@icloud.com

**Phone**

4084108213

**Address including county, and comments**

54218 Kalberer Rd Scappoose, OR 97056



From: ken alexander notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 17, 2023 at 10:25:28 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**

ken alexander

**Email**

alxk@ortelco.net

**Phone**

5414463413

**Address including county, and comments**

From: Laurel Roses notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 17, 2023 at 9:29:47 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Laurel Roses

**Email**

Mulinoroses@outlook.com

**Phone**

5035228748

**Address including county, and comments**

27562 S Ringo Rd, Mulino, OR, 97042

**Device**

From: Anita Alfonso notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 17, 2023 at 9:09:30 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Anita Alfonso

**Email**

anitacalfonso@yahoo.com

**Phone**

5034813056

**Address including county, and comments**

66002 Anliker Rd Deer Island, Or 97054

**Device**

From: David R Macauley  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 17, 2023 at 8:24:31 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

David R Macauley

**Email**

skimpzford@gmail.com

**Phone**

5417266390

**Address including county, and comments**

1067 Olympic St. Springfield, Oregon 97477 Lane  
County I stand with hard working Oregonians against

ODF 2023 HCP that hinders and shuts down our industries and livelihoods.

**Device**  
tablet

**Language**  
en-US

**Submitted\_from**  
Hcp petition

This message came from your contact form, [Oregon Stronger Together](#)

Download the Conversations mobile app for [iOS](#) or [Android](#), to access and respond to messages on the go

Sent via GoDaddy Websites + Marketing | [Manage Emails](#)

From: Bailey Enloe notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 17, 2023 at 8:03:14 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**

Bailey Enloe

**Email**

[Baileyenloe34@gmail.com](mailto:Baileyenloe34@gmail.com)

**Phone**

[5413790839](tel:5413790839)

**Address including county, and comments**

89191 easy way rd warrenton or 97146

**Device**

From: Bonnie Cleaveland  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 17, 2023 at 5:32:17 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Bonnie Cleaveland

**Email**

bjaycleave@yahoo.com

**Phone**

5412556569

**Address including county, and comments**

4566 Goddrich Hwy Oakland OR 97463 Douglas  
County

From: Bert tucker notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 17, 2023 at 4:26:34 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Bert tucker

**Email**

[Btucker0317@gmail.com](mailto:Btucker0317@gmail.com)

**Phone**

[5034405666](tel:5034405666)

**Address including county, and comments**

36231 binder slough lane, clatsop county , Astoria,  
oregon



From: Brandon Davis notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 17, 2023 at 3:13:38 AM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Brandon Davis

**Email**

Davisbrandon729@gmail.com

**Phone**

9712379958

**Address including county, and comments**

860 sw cherry st willamina oregon 97396

**Device**

From: Brandy Byers notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 16, 2023 at 11:04:38 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Brandy Byers

**Email**

tigress13@hotmail.com

**Phone**

3602813126

**Address including county, and comments**

PO box 83 Long Beach WA. 98631

**Device**

From: Angela Pember  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 16, 2023 at 8:59:15 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**

Angela Pember

**Email**

angiepace27@yahoo.com

**Phone**

5037912385

**Address including county, and comments**

185 N Main Ave PO Box 86 Warrenton? Oregon 97146  
Clatsop County

From: Kai Vaughn notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 16, 2023 at 8:17:09 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation:*

**Name**

Kai Vaughn

**Email**

[Kaivaughn@charter.net](mailto:Kaivaughn@charter.net)

**Phone**

[5034401627](tel:5034401627)

**Address including county, and comments**

90911 Lewis and Clark Rd. Clastop County, Astoria,  
Ore. 97103

From: Valerie Pena notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 16, 2023 at 8:12:23 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**

Valerie Pena

**Email**

Vgpena77@gmail.com

**Phone**

5414043071

**Address including county, and comments**

620 Bonneville Road Lakeside, Oregon 97449

**Device**

From: Nickolas Singleton

notifications@mail.conversations.godaddy.com

Subject: New job form message for Oregon Stronger Together via

Oppose the Oregon Department of Forestry HCP

Date: May 16, 2023 at 7:34:38 PM

To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Nickolas Singleton

**Email**

[nick\\_16029@hotmail.com](mailto:nick_16029@hotmail.com)

**Phone**

[5037241759](tel:5037241759)

**Address including county, and comments**

911 Sherwood pl Eugene OR 97401 Lane county

From: Andrew Carlson  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 16, 2023 at 5:18:11 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**

Andrew Carlson

**Email**

sureshot409.ac@gmail.com

**Phone**

5034406379

**Address including county, and comments**

91507 Railroad Rd Warrenton,OR 97146 Clatsop  
county

From: Pam A Rush notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 16, 2023 at 5:02:31 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Pam A Rush

**Email**

whatarush2009@hotmail.com

**Phone**

5037410715

**Address including county, and comments**

PO BOX 1173 Warrenton OR 97146

**Device**



From: Patricia McCubbin  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 16, 2023 at 3:40:04 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**  
Patricia McCubbin

**Email**  
p\_mcbear@yahoo.com

**Phone**  
5034809875

**Address including county, and comments**  
Box 7 97374

From: Calista Songstad  
notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 16, 2023 at 3:29:33 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**  
Calista Songstad

**Email**  
[calista@compassrosefisheries.com](mailto:calista@compassrosefisheries.com)

**Phone**  
[4252393182](tel:4252393182)

**Address including county, and comments**  
2673 NE Sunrise Lane Prineville OR 97754

From: Mike McKibbin notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 16, 2023 at 2:34:27 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**

Mike McKibbin

**Email**

memckibbin@yahoo.com

**Phone**

5038422857

**Address including county, and comments**

97141-8996

**Device**

desktop

From: Nick Smith notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 16, 2023 at 2:33:53 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

Reply to Conversation

**Name**

Nick Smith

**Email**

nicksmith1976@gmail.com

**Phone**

5035154206

**Address including county, and comments**

Nick Smith 18376 SW Salmonberry Lane Sherwood  
OR 97140

From: Bill Lansing notifications@mail.conversations.godaddy.com  
Subject: New job form message for Oregon Stronger Together via  
Oppose the Oregon Department of Forestry HCP  
Date: May 16, 2023 at 1:45:02 PM  
To: Jen Hamaker jenhamaker1@gmail.com

**Oregon Stronger  
Together  
has received a new  
message.**

*Reply to Conversation*

**Name**

Bill Lansing

**Email**

bill@billlansing.com

**Phone**

5412691642

**Address including county, and comments**

93962 Bridge View Lane North Bend, OR 97459

## **News from the North Coast – Spring 2023**

[Fire districts on the North Coast near breaking point](#) – The Daily Astorian, March 27, 2023

*Fire districts on the North Coast have scrambled to keep up as increasing call volume and demands for services push emergency response to the breaking point.*

*Despite differences in resources, budgets, staffing levels and ranges of duties, fire chiefs pointed to one vital need — volunteers.*

[Medix struggles to meet response time requirements](#) – The Daily Astorian, April 17, 2023

*Staffing and other challenges at the private ambulance service have led to delays.*

*Under its contract with Clatsop County, the private ambulance has different response time expectations in seven geographic zones. While crews cannot show up on time for every emergency call, they are required to meet the standard for at least 90%.*

*Fire crew response times are also influenced when Medix is late. Fire crews are obligated to stay at emergency scenes until Medix arrives, so delays can keep fire crews from responding to other calls.*

[Fire district in Lewis and Clark wants tax hike for operations](#) – The Daily Astorian, April 21, 2023

*Facing higher operations costs, the Lewis and Clark Rural Fire Protection District wants voters to approve a 25-cent increase to the tax rate of a five-year local option levy in the May election.*

*“(The levy) needed to go higher but there is no way I wanted to do that to the people, so I did the very minimum for it,” Jeff Golightly, the fire chief in Lewis and Clark, said.*

[As calls increase, staffing shortages mount for volunteer fire departments in Cannon Beach and Coos Bay](#) – OPB, April 23, 2023

*Firefighters along the Oregon Coast say they’re struggling to meet increasing call volumes with fewer and fewer volunteers.*

*Cannon Beach Fire & Rescue lost almost half of its paid volunteers over the last decade, dropping from 25 to 14. Meanwhile, calls for service increased by 16% last year.*

[Clatsop County transit district stops service over finances](#) – OPB, May 1, 2023

*A transit district that runs bus routes and paratransit services for Clatsop County riders and provides bus service between Astoria and Portland has suspended its operations due to financial problems.*

*The Sunset Empire Transportation District's board voted unanimously on April 27 to discontinue operations indefinitely and furlough employees. The agency has an annual budget of \$6.6 million and 46 employees.*

[State loan to help struggling transit district](#) – The Daily Astorian, May 2, 2023

*The state has extended a \$500,000 loan to the Sunset Empire Transportation District amid backlash to the agency's decision to suspend bus service and other operations because of a financial collapse.*

[Tillamook budget proposal could remove funding for unfilled sheriff's office positions](#) – KOIN, May 9, 2023

*Tillamook County's latest budget proposal would remove funding for six unfilled sheriff's office positions after the county reported that 11 positions have remained unfilled for three years.*

*Sheriff Josh Brown says his office is putting in thousands of hours of overtime, and the proposed cuts – if approved – could hurt morale.*

*"He comes before us, he makes his case, I do not see a situation in front of us where we would say no except if our timber revenue doesn't show up," Skaar said.*



**FOREST TRUST LAND COUNTIES**  
Direct Beneficiaries



**LANDOWNER**

**\$97.8M**

Timber Program Revenue (FY22)



**ODF TIMBER PURCHASER**  
Local Mills



**ROAD ENGINEERS**



**LOGGERS**



**LOG HAULERS**



**MILL WORKERS**



**SECONDARY MANUFACTURING**



**LUMBER TRANSPORT**



**MECHANICS & SUPPLY SHOPS**



**CAFES & RESTAURANTS**



**THEATERS & ENTERTAINMENT**



**SALES WORKERS**



**CONSTRUCTION & HOUSING**

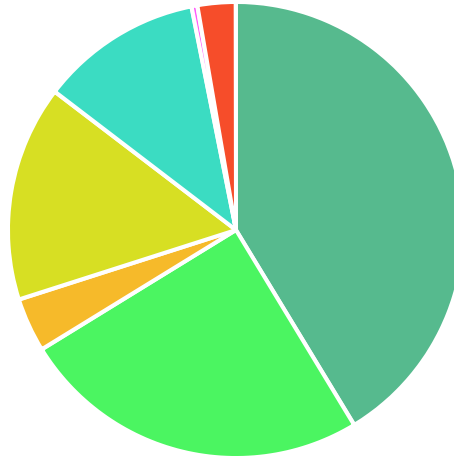
**+\$137.2M**

LOCAL ECONOMIC ACTIVITY



# 2022 OREGON STATE FOREST ECONOMIC IMPACTS

The social and economic impacts of Oregon State Forest timber harvests extend far beyond stumpage payments. In addition to the \$97.3M in stumpage revenue the Oregon Department of Forestry (ODF) and Forest Trust Land Counties collected in FY22, the 198.4 mmbf harvested generated an additional **\$137.2 MILLION** for logging, hauling, road building, and lumber businesses **IN LOCAL COMMUNITIES**.



Actual Economic Impact ODF  
Timber Harvest (FY22)

**\$235.5M**

### DIRECT AND INDIRECT

- Stumpage (ODF & Counties)
- Logging & Hauling
- Road Construction/Maintenance/Access
- Primary Mill Wages/Benefits\*
- Lumber Sales & Logistics
- Harvest Tax
- Lumber Trucking

ODF

**\$35.5M**

HARVEST TAX

**\$1M**

COUNTIES

**\$61.8M**

LOCAL RESIDENTS

**\$137.2M**

## INDIRECT BENEFITS OF ODF'S TIMBER PROGRAM: HAMPTON LUMBER CASE STUDY

### HAMPTON LUMBER

ODF TIMBER PURCHASED (FY22):

**61,007 MBF**



**+45 WEEKS OF SAWMILL OPERATIONS**

STUMPAGE VALUE: **\$25.9M**

- LOGGING & HAULING: \$15.6M
- ROAD BUILDING & MAINTENANCE: \$2.4M
- MILL WAGES & BENEFITS (HAMPTON ONLY): \$9.6M
- LUMBER TRUCKING: \$1.7M
- LUMBER SALES & LOGISTICS: \$7.2M

LOCAL BENEFITS: **+\$36.5M\***

**TOTAL BENEFITS: \$62.4M**

### 2022 ODF MULTIPLIER

**FOR EVERY \$1 ODF RECEIVED**

**+ \$1.41 WAS GENERATED**

TO LOG, HAUL, AND PROCESS THE WOOD

### ODF-DERIVED FINISHED PRODUCTS

**191,032**

METRIC TONS OF CO<sub>2</sub>e  
STORED IN LUMBER



**8,452**

2,600 SQ FT  
HOMES FRAMED



**17**

RESIDUAL  
PURCHASERS

\*DOES NOT INCLUDE HARDWOOD SAWMILL OR SECONDARY MANUFACTURING IMPACTS

# It takes a village

~85 small, family-owned businesses supported 32 ODF sales for Hampton Lumber in FY2022.

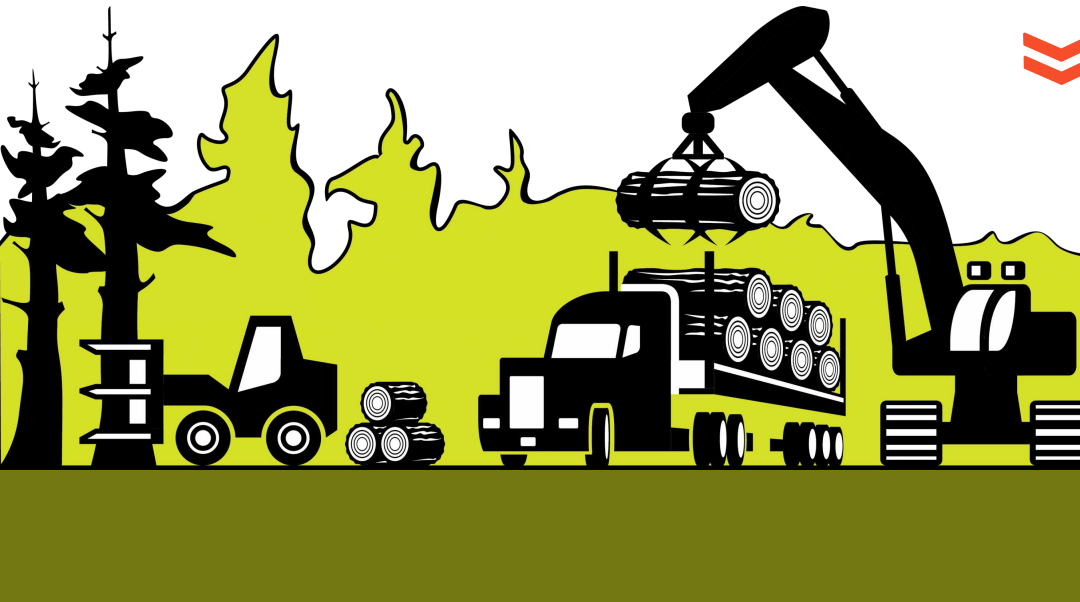
WHERE ARE THESE BUSINESSES LOCATED?



## 26 HAMPTON CONTRACTORS - LOGGING, HAULING & ROAD CONSTRUCTION

### 550 EMPLOYEES

- Braxling & Braxling
- JM Browning Logging
- Fallon Logging
- Smallwood Logging
- Risseeuw Logging
- Dave Dober Construction
- Siegmund Excavating
- LS&D Logging
- Marshall Logging
- Olson Brothers Logging
- .Heron Timber LLC
- Chavarria Construction
- Euchre Mt. Construction
- Warrenton Fiber Co.
- Chris Dials Contracting LLC
- D McCoy Inc.
- Hofenbredl Timber
- Chris Dials Contracting
- Gitchell Trucking
- Hopkes Logging
- Kottre Tree Farms
- Table Mountain Forestry LLC
- Vinson Brothers Construction
- Road Builders Inc.
- Porters Roadside Brushing & Mowing
- Severson Road Contractors



## 59 SUBCONTRACTORS

### TRUCKING

- CTT Farms
- Charles Bumgartner
- Dale Anderson
- Daniel Koch Trucking
- Dean Bergeron
- Dennis Lowe
- Denny Calloway
- Fall Creek Logging
- Garrett Martindale
- Gary Foglio Trucking
- HG Tucker, LLC
- Heith Pierce
- Heritage Trucking
- Ian Groshong Trucking
- James Gedenberg Log Trucking, LLC
- Jasen Branson Trucking
- Jeff Hancock Trucking

- Joe Remington
- John Hunter Jr Trucking
- John L Parks Trucking
- Jon L Golly
- KC & Sons LLC Trucking
- Kiser Trucking
- McCanna Trucking
- Micheal Craycraft Trucking
- Mike Genenberg Trucking
- Pacific Timber Trucking
- Pro Thin Logging
- RJ Stephens Trucking
- Randy Luoto Trucking
- Richard Remington
- Ripple Trucking
- Siletz Trucking
- Teevin Bros. Land & Timber

- Terry Freeman
- Tom Linton
- Waldron Trucking
- Zwald Transport Inc.

### TIMBER FALLERS

- Barcroft Timber
- Browning Timber Falling, LLC
- Cory Howell
- Frank Franklin
- Gary Dunn Timber Falling
- Howell Cutting
- Jason Dunn Timber Falling
- Mark Pierce
- O'Brian Timber
- Orrin Cook
- Rippet Timber Cutting

### ROAD BUILDING & FIRE COMPLIANCE

- 4 Dees Log Trucking LLC
- Aggregate Resources
- Big Wood Contracting
- Brink Fire Resources
- DK Quarries
- Farmington Rock
- Jason Hagan
- Keith Whitehead
- Nehalem Bay Ready Mix
- Robert Warren
- Roger Lane Trucking
- S-C Paving
- Sorensen Rock & Timber
- Western Rock Resources

STUMPAGE VALUE: \$25.9M + LOCAL ACTIVITY: \$36.5M = \$62.4M

**From:** [FORESTRY Boardof \\* ODF](#)  
**To:** [OLIVOS-ROOD Hilary \\* ODF](#)  
**Subject:** Fw: 6/7 Meeting, Comments  
**Date:** Thursday, June 15, 2023 1:16:45 PM

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---

**From:** Heather Ikeler <[REDACTED]>  
**Sent:** Friday, June 9, 2023 12:50 AM  
**To:** FORESTRY Boardof \* ODF <boardofforestry@odf.oregon.gov>  
**Subject:** 6/7 Meeting, Comments

Members of the Board,

I attended the BOF meeting on the morning of Wednesday June 7th in person but was not one of the many who provided testimony. The thoughtful and intelligent comments made in support of the HCP covered everything I wanted to say so I am now submitting in writing that I endorse those statements and the Board moving forward with a plan that is at least as beneficial to wildlife and carbon storage and sequestration as Alternative #3.

Thank you for all you do!  
Heather Ikeler, Portland, Oregon

**From:** [FORESTRY Boardof \\* ODF](#)  
**To:** [OLIVOS-ROOD Hilary \\* ODF](#)  
**Subject:** Fw: Testimony to Agenda Item #1 Board of Forestry Public Hearing June 7, 2023  
**Date:** Thursday, June 15, 2023 1:24:00 PM

---

---

**From:** Joan Kleban [REDACTED]  
**Sent:** Wednesday, June 14, 2023 3:53 PM  
**To:** FORESTRY Boardof \* ODF <[boardofforestry@odf.oregon.gov](mailto:boardofforestry@odf.oregon.gov)>  
**Subject:** Testimony to Agenda Item #1 Board of Forestry Public Hearing June 7, 2023

To Whom It Concerns ~ Chair Kelly and the Oregon Board of Forestry ~

Thank you to the Board of Forestry for taking the time to hear and consider opinions from so many Oregonians speaking about our future. My name is Joan Kleban, I have lived in Eugene since 1976. I currently volunteer with 350Eugene.org as an Artist to inspire and educate about the climate collapse we are now experiencing.

We all live downstream, in the many iterations of that concept, and we can no longer delay the work necessary to make deep system changes to mitigate climate shifts that affect air, water, species survival, housing issues, food security, and so much more. We are beyond the tipping point, but there is still hope to save what is left.

Old growth and mature forests are a precious and vital part of Pacific Northwest ecosystems. We must leave standing trees, preserve the mature and old growth that remains. We must shift our future wealth measurements with the focus on supporting essential commodities: clear water, clean air, good health with moderate temperatures that are essential to maintain biodiversity and fragile ecosystems in order for our bio region to thrive. Clearly, the global economy based on (human) monetary systems has lost sight of Planet Earth's fragile survival.

The Board of Forestry has an opportunity to influence the future with strong directives that will preserve and rehabilitate waning habitats. Please do the right thing.

Let's be sure, be assertive and vote for a sustainable future to gain the needed shift away from our climate decline, toward healthy forests and rivers and ocean waters.

I support the strongest protective resilience of the listed choices in Item #1 Habitat Conservation Plan, notably Agenda Item #1 HCP option 3.

Thank you for your work.

Sincerely,  
Joan Kleban

[REDACTED]

Eugene, Oregon [REDACTED]

Chair Kelly and Board of Forestry Members:

I hope you enjoyed your time in Sisters Country.

In 1890, the first sawmill was built in Sisters on what is now known as Whychus Creek. By 1930, Sisters was primarily known as a lumber-producing town. The Sisters Library was built in 1939 with money from local residents and businesses, and lumber donated by local mills. By 1946, growth facilitated the need to incorporate. The population grew from less than 200 to nearly 500. In 1949, an existing office from a local sawmill was donated and attached to the library to provide additional bookshelf space (the structure was retired as a library in 1990).

Gradually, lumber production slowed. In 1953, the timber economy had busted, forcing one sawmill to close, which resulted in a \$300,000 annual payroll loss. Ten years later, the last mill in Sisters was closed. Soon thereafter, the population began to decline as my grandparents were forced to the unemployment line.

On the eastern edge of town was the original 1,400 acre working cattle ranch known as the Lazy Z Ranch. After the mills closed, my grandparents found employment here and managed the ranch for the next 26 years. I was placed on the payroll when I turned 12. The ranch was founded in the early 1880's and survived through six generations. Today's Lazy Z Ranch is only 83 acres. The remaining 1,317 acres have since been divided for development.

What remained of the local milling and logging infrastructure in Sisters Country received its final blow in the early 1990's for the sake of protecting the Northern Spotted Owl. Less than 15 years later, the surrounding forests began to burn. From 2002 – 2012, seven times more acres burned in Sisters Country than in the previous 100 years (1900-2000). Those fires included:

- B&B Complex (2003) – 91,000 acres
- Pole Creek Fire (2013) – 26,000 acres
- Milli Fire (2017) – 24,000 acres

However, one of the most devastating wildfires in Oregon's history is still the Tillamook Burn from 1933 through 1951 which engulfed 355,000 acres. In 1948, Oregonians narrowly passed a constitutional amendment to sell \$12 million in bonds to reforest the land. Between 1949 and 1972, more than 72 million seedlings were planted and a billion seeds were dropped from helicopters. Something that most folks don't realize is the fact that since those fires, that forest has been actively managed to become the Tillamook State Forest. When harvest occurred, repayment costs of the bonds were taken off the top prior to timber revenue receipts being divided between Trust Land Counties and the Oregon Department of forestry.

As the Forest grew, so did the demand for management. In 1995, I moved from Sisters and began my forestry career on the Tillamook State Forest. As I began building relationships with my co-workers, I quickly realized how impactful the jobs and revenue created by the forest were to the community. At this time, Tillamook County was known for the highest teen pregnancy rate in the state, the worst county roads in the state and an underfunded public safety department leading to high crime and domestic violence. This reminded me of Sisters Country after federal timber sales were all but eliminated.

By the mid 1990's, The Tillamook State Forest was in a position to begin a steady commercial thinning program. Jobs and revenue became more consistent and the social fabric began to mend. Access through the forest was improved and recreators gladly followed. 70 years after the last of the fires were extinguished, the reforestation efforts are continuing to produce results in the form of family wage jobs and sustainable revenue for local taxing districts. Unfortunately, there is a draconian effort on the part of special interest groups to reduce timber harvest by 34% for the next 70 years. All at the expense of rural Oregonians.

I've heard comments from Board of Forestry members about being "between a rock and a hard place" or that "it just is what it is". A 70-year commitment to the social fabric for rural Oregonians and the health of our managed State Forests deserve more than a cliché. I respectfully request this board consider the social strife that has been inflicted throughout this great state as a result of discontinuing active management on state and federal lands. This HCP is not the social legacy you should impart on our children and grandchildren.

Dave Kunert

*Dave Kunert*

Lane County  
Audubon  
Society



PO Box 5086, Eugene OR 97405  
541-485-BIRD (2473)  
laneaudubon.org

Dear Chair Kelly and the Oregon Board of Forestry,

I am writing on behalf of the Board and members of the Lane County Audubon Society. We appreciate the opportunity to comment on the Western Oregon State Forest Habitat Conservation Plan. Our organization is dedicated to the conservation of the natural environment with a primary focus on birds, and other wildlife and their habitats. Our members value a healthy forest because it:

- Provides critical habitat for fish, birds, and other wildlife. In the western United States, they provide habitat for over 3,000 species, many of which do not occur elsewhere.
- Provides critical wildlife corridors across the landscape. This is critical for healthy gene flow, successful mating opportunities, securing resources throughout the seasons, and protecting large animals that range widely.
- Promotes climate resiliency by sequestering and storing carbon and maintaining healthy watersheds.
- Increases resilience to the risks imposed by climate change and concurrent disease threat.
- Reduces wildfire impacts and are more resilient to the impacts of wildfire.
- Cleans and filters water. Provides clean drinking water. Cleans the air.
- Cools stream temperature to promote salmon success and reduce algal blooms.
- Reduces erosion and spread of invasive species.
- Mitigates storms, droughts, and other harsh weather impacts.
- Provides opportunities for healthy outdoor recreation and solace. Data has shown that time spent in nature is good for both our physical (including immune health) and our mental wellbeing.
- Improves local economies through recreation and tourism industries.

We urge that the extent and impact of logging activity be minimized so that the public can continue to enjoy the benefits of our state forests. We support a plan that is at least as protective as Conservation Alternative 3. This alternative balances sustainable timber harvest with the many other benefits that the forests provide. The proposed Habitat Conservation Plan was reached as a compromise solution after years of public input and debate between various stakeholders. Although part of the group of stakeholders that negotiated the draft HCP, the timber industry is now pushing to get rid of the compromise, erroneously claiming that it would cut jobs. In fact, an analysis (Dept of Forestry) calculated that timber jobs would increase more than 40% in Tillamook County and 10% in Clatsop County.

We urge you to please adopt a strongly protective HCP. Thank you.

Sincerely,  
Debbie Schlenoff, Ph.D.  
Conservation Chair  
Lane County Audubon Society



**From:** [FORESTRY Boardof \\* ODF](#)  
**To:** [OLIVOS-ROOD Hilary \\* ODF](#)  
**Subject:** Fw: June Board of Forestry meeting: agenda item 1 | submitted written comment  
**Date:** Tuesday, July 11, 2023 10:42:04 AM

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**From:** Theresa & kate [REDACTED]  
**Sent:** Wednesday, June 21, 2023 7:27 PM  
**To:** FORESTRY Boardof \* ODF <[boardofforestry@odf.oregon.gov](mailto:boardofforestry@odf.oregon.gov)>  
**Subject:** June Board of Forestry meeting: agenda item 1 | submitted written comment

Dear Chair Kelly and members of the Board of Forestry:

We offer this letter as an encouragement to reconsider the current draft HCP for state forest lands. From the sustained outcry from members of the rural communities most impacted by the decreased harvests projected under the plan, there are clearly grave concerns that should be addressed before moving forward. As you know, the management of Oregon's state forests are intended to benefit *all* Oregonians, not simply those who, often without understanding the role of sustainable forest management in maintaining forest health and resilience, oppose the cutting of any tree. Although all Oregonians have a stake in Oregon's forests, not all Oregonians have the same relationship to and intimate knowledge of what constitutes sustainable care of Oregon's forests. We are centuries beyond just "letting forests be forests." Forests are not abstract; they are living ecosystems that require scientifically informed, active care and management. Caring *about* Oregon's forests is not the same as caring *for* them—and the voices of those whose very lives are spent doing the latter should carry more weight because of that simple fact.

An additional element of the draft HCP that is worthy of reconsideration is the impact of a reduction in harvest levels on the ODF budget. This seems particularly concerning in a time of increased personnel pressures on the department, whether for fighting fires or implementing (learning/explaining/monitoring) the PFA-related changes to the Forest Practices Act. Relying on general fund dollars—or increased harvest tax dollars from private land sources—seems both risky and unsustainable.

Lastly, it is vital for the Board to keep in mind, in all of the difficult decisions before you, that there are significant pressures on family forest owners in the current literal and political climate that are concerning for Oregon's forests and Oregon's future. From concerns over loss of milling infrastructure—and the concomitant cascading loss of forestry contractors—to loss of harvestable areas due to the current changes in the Forest Practices Act, private woodland owners are feeling under attack. Additionally, the aging of ownership base and the lessening interest of succeeding generations to enter the fray that has become part and parcel of family forestland ownership is a serious threat to keeping small forests as forests. The appeal—and therefore the threat—of land conversion is very real. Losing a small forested acreage here or there may not seem unduly concerning—but with 75,000 small woodland owners in the state, those small acreages can add up quickly and the losses could be devastating to Oregon's forested future.

There is no shame in stepping back and taking time to fully and thoughtfully reconsider the draft HCP. In fact, it is the courageous choice: to honor the voices of rural communities, even though they may be smaller in number, than their urban counterparts. Rural voices, rural communities are a vital part of Oregon's history, Oregon's present and Oregon's future. They deserve to be heard and taken seriously—especially with their lives and livelihoods at stake.

Thank you for the important work you do for ALL of Oregon's forests and the people who love and rely on them.

Kate McMichael  
Theresa Hausser  
Vida, OR



June 7, 2023

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

Chair Kelly and Board of Forestry Members, and State Forester Mukumoto

My name is Knox Marshall, and I am the Vice President of Resources for Murphy Company located in Eugene, Oregon. Please accept this written testimony for submission of public comments, Agenda Item 1, 6/7/2023 public meeting.

As I have mentioned before I would like to suggest that the Board consider a different meeting format periodically to hear from a full spectrum of stakeholders that are selected by the staff to consider a balanced approach with testimony provided by invited individuals. A format with longer testimony followed up by panel discussion, providing Board members the ability to ask questions to those providing testimony. There is great value for the Board Members to be able to engage directly with a panel of commentators if questions arise specifically around topics covered. This does not need to be every public meeting but a movement towards this format periodically would be encouraging for those who are going to be most impacted by policy changes.

Founded in 1909, Murphy Company operates facilities in Washington and Oregon. Murphy employs approximately 970 people and is a leading producer of hardwood and softwood plywood, laminated veneer lumber (LVL), and softwood veneer in the Pacific Northwest. Murphy Company operates two veneer plants in Oregon that are dependent on the ODF timber sale program. The timber offered by the ODF into the marketplace is critical to our milling infrastructure and generates stable revenue for the counties that depend on them. Sustainable forest management is critical for maintaining the milling infrastructure in small communities where our facilities are located and the jobs, they support are a key piece of the economic stability of the community.

I am commenting today on the importance of sustainable timber production from the ODF State Land. The timber offered from State Lands is critical to the milling infrastructure in Rural Oregon. The timber harvested creates revenue critical for the

counties that depend on them. The harvest level over the last decade is critical for maintaining the milling infrastructure in Oregon's rural communities where our facilities are located and the jobs, they support are vital to the economic stability of each community. Any reduction will jeopardize that balance.

Decisions for the future of the Oregon State Forests must consider what impacts there will be as a result of these local decisions. Oregon's population is increasing and the demand for wood products is on the rise. The concept of sustainable forest management can be described as the attainment of balance. The balance between society's demands for forest products and the preservation of forest health and diversity. Responsible sourcing considering a global perspective is essential. This balance is critical to the survival of forests and the well-being of forest-dependent communities in all areas of the world.

Humans are not a zero impact species. Balance is vital for our planet and the interactions throughout the global ecosystem. Balance of our social responsibilities and equity for all communities, urban and rural, must also be considered. Rural communities are disproportionately taking on the burden of the urban communities misguided understanding of the global balance. Single decisions, including sustainable management of our state forests must consider the other impacts they will create elsewhere. Our rural communities deserve consideration when contemplating decisions to import wood products from offshore to satisfy urban demands as we further constrain our domestic outputs.

As the Board considers options for the State Forests, it should be recognized that highly regulated domestic producers will decline, and wood products will be imported to meet the shortfall in supply. As Oregonians it is our responsibility to sustainably manage all forest lands for the perpetual outputs that balance the goals for the global environment with equitable economic considerations to our urban and rural population.

We are confident that the Board of Forestry members will consider the best scientific guidelines on what should be recognized as it relates to carbon sequestration and active forest management. The Intergovernmental Panel on Climate Change (IPCC) 4<sup>th</sup> Assessment recognized not only the carbon mitigation benefits of forests, but also the wood products derived from forests.

- *“Mitigation options by the forestry sector include extending carbon retention in harvested wood products, product substitution, and producing biomass for bioenergy. This carbon is removed from the atmosphere and is available to meet society's needs for timber, fiber, and energy.”*
- *“In the long term, a sustainable forest management strategy aimed at maintaining or increasing forest carbon stocks, while producing an annual sustained yield of timber, fiber or energy from the forest, will generate the largest sustained mitigation benefit.”*

The IPCC 6<sup>th</sup> assessment directly points out the global picture and what costs to carbon sequestration will be to substituting either other building products that are more carbon intensive in acquiring and producing, or even if substituting for other wood products from across the world what will be the additional energy used in generating and transporting those products to where they are used.

- “...carbon storage in wood products and the potential for substitution effects can be increased by additional harvest, but with the risk of decreasing carbon storage in forest biomass when not done sustainably (Smith et al. 2019b). Conversely, reduced harvest may lead to gains in carbon storage in forest ecosystems locally, but these gains may be offset through international trade of forest products causing increased harvesting

There often seems to be a lack of recognition from those who ideologically oppose active forest management that human activity – meeting society’s needs – requires tradeoffs. Short-term and long-term. As the IPCC makes clear sustainable, science-based management and the forest products sector is part of the climate solution. The conversation must focus on finding balance, not on an unrealistic expectation that we can meet the needs of an eight billion world population without environmental, social, and economic tradeoffs. We rarely consider or evaluate the impacts of *not* taking action. At Murphy Company, we are committed to that balance.

We are appreciative that the Board of Forestry is being careful in all its assumptions to maintain a viable industry for equity towards the rural communities of Oregon while perpetually managing the state forests for sustained production of forest products. The decisions made on the trajectory of these forests are critical to our state’s future as a provider of raw materials for our society’s needs and all the ecological contributions managed forests provide. The debate over the importance of these issues will continue. There is often a failure by those who ideologically oppose active forest management to recognize these values are *already* shared by most Oregonians and have long been practiced by those working within the timber industry, creating an “either/or” conflict rather than appreciating that Oregon’s forests are an “and/in addition to” asset. These values are the future of management decisions and will shape and guide the view of forest management worldwide. Please be careful in consideration of management decisions that will drastically change the future of these State Forests.

If you have any questions, please call me at [REDACTED].

Sincerely,



Knox Marshall  
Vice President Resources  
Murphy Company

Hello,

My name is Buck Olen and I'm the Sustainability Coordinator at Mountain Rose Herbs, I'd like to thank the Chair Kelly and Members of the Board for this opportunity to provide public comment today supporting the HCP alternative 3. I love Oregon and more than anything I love the beautiful forests, rivers, and lakes that can be found between the Pacific Ocean and the soaring Cascade Mountains. I spend my free time hiking trails, biking scenic roadways, and watching the spectacular wildlife that Oregon is famous for. It is essential that you support a strong Habitat Conservation Plan for Western Oregon State Forests, that is at least as robust and protective as Conservation Alternative 3, that is grounded in science-based data and protects fish and wildlife for the benefit of all Oregonians.

Public lands must be managed for the public good of all Oregonians. There are many considerations, and many livelihoods depend on the resources and richness Oregon State Forests offer. Mountain Rose Herbs is entirely based in Eugene, Oregon, and sells a wide variety of herbs across the USA, many of which are ethically wild harvested. Intact, bio-diverse ecosystems are essential for our industry, for the botanicals that we source, for the two-hundred employees we have in the Eugene area and the millions of dollars in revenue our business generates every year. Mountain Rose Herbs understands the connection between the health of these ecosystems and the vitality and resiliency of our community and our business. We support environmental conservation, regenerative organic agriculture, and social justice. Approving a strong HCP not only provides more to habitat conservation, but it also enhances recreation, economic diversity, and ongoing timber production.

Managing these lands requires us to consider the needs and challenges we face as Oregonians, but also needs, challenges, and outcomes of current policy for future generations. The fish, wildlife, rivers, and forests that exist in our state lands belong to, and are the responsibility of, all Oregonians. I urge you to make the decision for a strong HCP based on Alternative 3, it is the minimum of what we should be doing to ensure that the greatness of Oregon isn't diminished. We must consider the impact of the decisions we make today for all Oregonians, both now and in the future.

I'm a proud Oregonian, thankful for the opportunity to provide public comment today, and eager to know that I can continue to be proud of the way we manage our public forests.

Buck Olen | Sustainability Coordinator  
[sustainability@mountainroseherbs.com](mailto:sustainability@mountainroseherbs.com)

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Mountain Rose Herbs

██████████  
Eugene, OR ██████████

██████████  
[www.mountainroseherbs.com](http://www.mountainroseherbs.com)

  
mountain rose herbs





June 1, 2023

Board of Forestry  
ODF Board Support Office  
2600 State St.  
Salem, OR 97310

Dear Chair Kelly, Board of Forestry Members, and State Forester Mukumoto:

On behalf of our members, the Oregon Public Ports Association (OPPA) is writing you to express our concerns with the direction of the Oregon Department of Forestry's (ODF) proposed Habitat Conservation Plan (HCP) for state forestlands. Oregon's 23 ports provide recreational, commercial, and economic services to residents and businesses in Oregon and beyond, serving as state, national, and international transportation gateways. They are a key component in sustaining Oregon's economy and quality of life and support thousands of family-wage jobs. One in six Oregon jobs is directly or indirectly tied to cargo, recreation, industrial, commercial, or other activities at Oregon's ports.

Our ports are predominately located in natural resource dependent communities where livelihoods are threatened by the draft HCP and the resulting 34 percent reduction in timber harvest from state forestlands. We ask that the Board of Forestry (Board) consider our members and their employees, tenants, customers, and communities before finalizing this plan.

In addition to the economic ties that ports have with the forest sector, several of our member ports receive funding from state timber revenue. Small ports that lack deep draft capabilities still service small family-operated fishing, seafood, and other businesses and timber revenue is critical to their ability to maintain port infrastructure and dredging operations. Funding needs for infrastructure upgrades and hazard resiliency planning and preparedness will only increase in the coming years.

Working forests, working waterfronts, agricultural lands, and the manufacturing jobs they create are the true backbone of our coastal communities. The ramifications of lost capacity in any one of these sectors will ripple throughout the coastal economy and affect a wide array of business operations and public services.

We believe the HCP process should be paused until ODF and the Board have fully studied the broader implications of this HCP and made modifications to the plan to better protect local businesses, ports, and public services. Given coastal communities will have to live with the impacts of this plan for the next 70 years, we believe the Board owes it to them to explore opportunities to improve economic outcomes under an HCP before it is too late.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Landauer", written in a cursive style.

Mark Landauer  
Executive Director  
Oregon Public Ports Association

**From:** [FORESTRY Boardof \\* ODF](#)  
**To:** [OLIVOS-ROOD Hilary \\* ODF](#)  
**Subject:** Fw: Agenda item #1 at 6/7/23 public meeting  
**Date:** Friday, June 30, 2023 11:20:26 AM

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**From:** Emily Polanshek <[REDACTED]>  
**Sent:** Friday, June 16, 2023 9:12 PM  
**To:** FORESTRY Boardof \* ODF <boardofforestry@odf.oregon.gov>  
**Subject:** Agenda item #1 at 6/7/23 public meeting

Chair Kelly and Members of the Board,

My name is Emily Polanshek. I am a retired teacher from Canby School District. My husband and I have two grandchildren, ages 6 and 9. I am a passionate advocate for a livable world for my former students, my grandchildren, all other children alive today and yet to be born.

My husband and I relish hiking, biking, camping, birding, and swimming in natural areas as often as possible. When we do, we make sure to patronize nearby local businesses and tip well at eateries.

Thank you for this opportunity to comment in favor of a strong Habitat Conservation Plan for Western Oregon State Forests. Of the currently-available versions, I support Conservation Alternative 3 that is science-based and protects fish, forests and wildlife for the benefit of us all.

In addition to my passion to protect natural areas for recreation, I have two other vital concerns:

- We must protect habitat and biodiversity as if our own survival as humans depended on it, because it does. Life on this planet is interconnected. We put our own species at risk when we plunder and extract natural resources as if they were infinite. Our wild spaces have dwindled greatly. I believe, from my readings, that we need to return as much land to the wild as possible.
- We must protect old growth and mature forests as natural carbon sinks. Science tells us we have already crossed some vital tipping points by increasing the amount of greenhouse gases\* in the atmosphere, with tipping points fast approaching. We can expect storms of all sorts, and wildfires and flooding, to intensify and become more frequent.

Please, I beg of you, approve the strongest possible Habitat Conservation Plan for Western Oregon State Forests. Do it for your children and grandchildren too!

Thank you,  
Emily Polanshek

\* <https://www.climate.gov/news-features/understanding-climate/climate-change-atmospheric-carbon-dioxide>

May 12, 2023

Based on the annual report from NOAA's Global Monitoring Lab, global average atmospheric carbon dioxide was 417.06 **parts per million** ("ppm" for short) in 2022, setting a new record high. The increase between 2021 and 2022 was 2.13 ppm—the 11th year in a row where the amount of carbon dioxide in the atmosphere increased by more than 2 ppm.

Sent from [Mail](#) for Windows





# THE PORTLAND GARDEN CLUB

June 7, 2023

Oregon Board of Forestry  
2600 State Street – Building C  
Salem OR 97310

Re: Portland Garden Club Support for Western Oregon State Forest Habitat Conservation Plan

Dear Chair Kelly, Members of the Board of Forestry and Chief Forester Mukumoto:

The Portland Garden Club submits this letter as an addition to the record for the testimony given to the Board on June 7, 2023 by its president Linda Morrow in support of implementing the Western Oregon State Forest Habitat Conservation Plan Preferred Option.

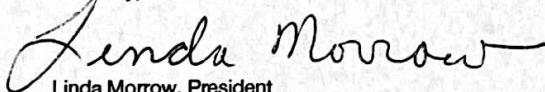
The Portland Garden Club is a non-profit organization founded in 1924 with over 330 members. We are a member of the Garden Club of America with 18,000 members in 199 clubs nationwide.

Last October The Portland Garden Club submitted a letter to the Board in support of the HCP Preferred Option, which is consistent with the Garden Club's mission to aid in the protection of native species and the improvement and protection of the environment.

The HCP Preferred option has been four years in the making, led by the Oregon department of Forestry with extensive research and input from all stakeholders including environmentalists, conservationists, scientists, timber representatives, tribal interest groups and the public. Further discussion and consideration of other, undeveloped alternatives could go on indefinitely without substantive results.

The Portland Garden Club supports implementing the HCP Preferred Option. In moving forward with the plan, we urge that state forests be fairly and sustainably managed to meet the needs of both the community and the environment and in so doing ensure the long-term health and vitality of the community, wildlife and the environment.

Sincerely,



Linda Morrow, President  
The Portland Garden Club

**From:** [FORESTRY Boardof \\* ODF](#)  
**To:** [OLIVOS-ROOD Hilary \\* ODF](#)  
**Subject:** Fw: NW Steelheaders Supports the HCP Alternative 3  
**Date:** Thursday, June 15, 2023 1:15:19 PM

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**From:** Norm Ritchie [REDACTED]  
**Sent:** Wednesday, June 7, 2023 9:37 PM  
**To:** FORESTRY Boardof \* ODF <boardofforestry@odf.oregon.gov>  
**Cc:** Bob Oleson [REDACTED]  
**Subject:** NW Steelheaders Supports the HCP Alternative 3

Chair Kelly and members of the board,

My name is Norm Ritchie and I am a board member of the Association of NW Steelheaders. I have a home in Rockaway Beach, surrounded by the Tillamook Forest. I have fished Tillamook Bay, its tributaries and the ocean for over 5 decades for salmon, steelhead and trout.

The Association of NW Steelheaders is made up of thousands of passionate Conservation minded sport anglers that enjoy fishing the waters of the Tillamook State Forest and contribute time and money to restore its fish populations. The wild fish of the Tillamook State Forest are at the brink, so we need other forest stakeholders to help our once-abundant wild fish. Public polls show that Oregonians wish these public lands to be prioritized for the management of cold, clean water and ample fish and wildlife habitat along with timber harvest. We will continue to support timber harvest but Salmon are a forest product too. With lethal summer water temperatures taking a significant toll on salmon, steelhead and other species, NOW is the time to right the wrongs of the past that are compromising the recovery of these fish.

The ANWS urges moving forward with the Habitat Conservation Plan with strong support for ALTERNATIVE 3, providing the best possible protections for our imperiled wild salmon and steelhead populations, giving them a fighting chance to recover and hopefully thrive throughout these north coast watersheds. Alternative 3 is a step in the right direction.

Thank you

*Norman E. Ritchie*

At Large Director

**Association of Northwest Steelheaders**

[REDACTED]  
[REDACTED]

**From:** [FORESTRY Boardof \\* ODF](#)  
**To:** [OLIVOS-ROOD Hilary \\* ODF](#)  
**Subject:** Fw: Ensuring a strong and effective Habitat Conservation Plan  
**Date:** Thursday, June 15, 2023 1:21:42 PM

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**From:** RAND SCHENCK <[REDACTED]>  
**Sent:** Tuesday, June 13, 2023 3:19 AM  
**To:** FORESTRY Boardof \* ODF <boardofforestry@odf.oregon.gov>  
**Subject:** Ensuring a strong and effective Habitat Conservation Plan

To: Oregon Board of Forestry  
From: Rand Schenck, Forestry Lead, Metro Climate Action Team  
Date: June 6, 2023  
Subject: HCP and FPFO

Chair Kelly and Members of the Board of Forestry,

I want to make a comparison to the HCP and FPFO process you are now engaged in and what happened in our National Forests in the Pacific Northwest some 30 years ago. Those forests for several decades were harvested at unsustainable levels and finally in the early 90s the Judicial branch of our government told the Executive and Legislative branches to stop breaking the law and comply with the Endangered Species Act. The result was the Northwest Forest Plan. Another result was the need to revise forest management plans, many of which were developed over the decade of the 80s, to ensure compliance with the law.

With the HCP you are simply acting to comply with the law. The HCP process needs to continue to ensure your compliance. Now, 30 years after the Northwest Forest Plan, we are faced with catastrophic climate change, climate crisis, climate chaos. April was our coldest month on record. May had more 90 degrees days than were ever recorded historically. We face the imperative of doing what we can to mitigate that crisis, that chaos. The Greatest Permanent Value should include mitigation. The most powerful natural climate solution by far is to simply grow trees longer.

Over time the Northwest Forest Plan led to an approach called ecological management. Now that approach could be called climate smart forestry. That is what the Board needs to pursue with its HCP and FPFO. Forestry that optimizes carbon sequestration and storage and resilience while minimizing greenhouse gas emissions. Grow trees longer, protect mature and old growth trees, maintain a diversity of species, ages and structures.

Thanks for your consideration,

Rand Schenck,  
Forestry Lead, Metro Climate Action Team

**From:** [FORESTRY Boardof \\* ODF](#)  
**To:** [OLIVOS-ROOD Hilary \\* ODF](#)  
**Subject:** Fw: Testimony for Board of Forestry About HCP -  
**Date:** Thursday, June 15, 2023 1:14:42 PM

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**From:** Mary Schutten <[REDACTED]>  
**Sent:** Wednesday, June 7, 2023 3:03 PM  
**To:** FORESTRY Boardof \* ODF <boardofforestry@odf.oregon.gov>  
**Subject:** Testimony for Board of Forestry About HCP -

### Mary Schutten's Testimony

- Mary Schutten
- Non affiliated
- [REDACTED]
- Agenda item focus: Agenda for June 7th, 2023, item #1. about Habitat Conservation Plan (HCP)

Greetings Board Members:

Thank you to the Board for all your hard work. It is critical that we move forward on the long overdue Habitat Conservation Plan. The ecosystem cannot wait any longer. Please support Alternative 3, it provides the best protections possible for our coastal ecosystems.

It's critical that we move forward on the long overdue Habitat Conservation Plan. The ecosystem cannot wait any longer.

Years ago I helped run a commercial fishery for salmon. I experienced how Alaska protects its natural ocean fishery resources ! Oregon can too.

I am a typical Oregonian who loves fishing w/pole. However, I am seeking MORE opportunities, not less. Coastal salmon opportunities have dropped precipitously in recent years.

Most importantly, I live on the water because I know its value as Oregon's greatest asset, A robust HCP protects clean, cold water which in turn improves the whole ecosystem we all care about. Again, please support Alternative 3, it provides the best protections possible for our coastal ecosystems.

Thank you for the opportunity to have my voice heard.

Stay safe and strong,  
Mary Schutten

*"We are the ones we have been waiting for."*

--

**Stay safe and strong,**  
Mary  
She/her/hers

*"We are the ones we have been waiting for."*

Southern Oregon Climate Action Now

**SOCAN**

Confronting Climate Change

<https://socan.eco>

Alan R.P. Journet Ph.D.

Cofacilitator

Southern Oregon Climate Action Now

7113 Griffin Lane

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May 28<sup>th</sup> 2023

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541-301-4107 / 541-500-2331

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

Chair Kelly and members of the Oregon Board of Forestry

I write as cofacilitator of Southern Oregon Climate Action Now, an organization of over 2000 rural Southern Oregonians who are concerned about the climate crisis and urge statewide action to address it. Our mission is to promote awareness and understanding about the climate crisis and stimulate individual and collective action to address this existential problem, doing so within a framework of promoting social justice.

I write today in relation to efforts by the timber industry to undermine the Forestry Accord by promoting logging at the expense of other forest services.

I note that a survey undertaken by Oregon Values & Beliefs Center reveals that Oregonians generally place far greater value on the natural and life support services our forests perform than on their role in providing lumber. Thus OVBC (2022) reports 89% of respondents (N = 1,554) categorize habitat for wildlife as either very important (73%) or somewhat important (16%), while the same % identify cool, clean water for fish as very important (71%) or somewhat important (18%), and 88% identify drinking water for nearby communities as very important (88%) or somewhat important (18%). Meanwhile, 68% identify carbon storage (mitigating climate change) as very important (50%) or somewhat important (18%). At the lower end of the scale of values, we find lumber for construction at only 58%, with very important (33%) and somewhat important (25%) while economic support for rural communities scores only 62%, with very important (40%) and somewhat important (23%).

Unsurprisingly, we at Southern Oregon Climate Action Now would place a higher priority on carbon storage than the poll suggests does the general population.

The message from this poll is that timber products from our forests are not ranked as important by Oregonians as are wildlife and climate services. It is in this vein that I urge the Oregon Board of Forestry to evaluate the Habitat Conservation Plan options resulting from the Forestry Accord.

Thus, given the OVBC poll data and the SOCAN concerns about the climate crisis, we strongly urge the Board of Forestry to look favorably upon HCP Alternative 3.

Maybe it's time for Oregon to adopt a Greatest Permanent Value statement for forest management that acknowledges the values that Oregonians assign to our forests over and above that of extractable timber.

Respectfully submitted,

A handwritten signature in black ink that reads "Alan R.P. Journet". The signature is written in a cursive, flowing style.

Alan R.P. Journet Ph.D.  
Southern Oregon Climate Action Now

Source Cited:

OVBC 2022 Forest Management Practices. Oregon Values & Beliefs Center <https://oregonvbc.org/forest-practices/>



June 7, 2023

Board of Forestry  
ODF Board Support Office  
2600 State St.  
Salem, OR 97310

RE: June 2023 Board of Forestry Meeting Written Comments – Agenda Item 1

Dear Board Members:

The Special Districts Association of Oregon represents over 960 special service districts throughout Oregon who provide services ranging from fire protection, health care, water, wastewater, park and recreation, irrigation, transportation, and many others.

512 of these districts are located in the fifteen counties that are part of the Council of Forest Trust Land Counties. Many of these districts are almost entirely dependent on property taxes and the revenues they receive from State Forest Lands. Property tax dependent special districts have limited to no options for raising additional revenue because of Oregon's property tax limitations. Fire districts are probably the most impacted type of special district, because of their high reliance on the limited property taxes they receive. Reducing their revenue from any source, especially from State Forest Lands, will have a direct impact on their ability to assist in protecting from wildfire the forests that the Board of Forestry is charged with managing.

You will see from the attached document, which displays the operating budget of special districts located within the fifteen counties, that most of these districts serve disadvantaged communities with significantly small budgets. 170 operate on a budget of under \$100,000. For these special districts even a small reduction in revenue is the difference between affording tires for trucks, purchasing needed medical supplies or adequately staffing critical lifesaving services.

Because of the critical financial impact on special districts and the communities they serve SDAO supports the Forests Trust Land Advisory Committee's position that the Habitat Conservation Plan process should be paused to fully consider the financial impact that it will have on the special districts that rely on State Forest Land funds to serve their local communities and protect the State forests.

Sincerely,



Frank Stratton  
Executive Director

EntityName	County	City	Type	Budget
Deer Island Drainage Improvement Company	Columbia	St. Helens	Drainage	1,000
Mill Four Drainage District	Lincoln	Toledo	Drainage	1,159
Country Estates Road District	Benton	Corvallis	Road	1,868
Green Knolls Special Road District	Klamath	Klamath Falls	Road	2,000
Bear Valley Special Road District	Lincoln	Otis	Road	2,500
Oakville Community Center	Linn	Shedd	Park & Recreation	2,500
Meadows Drainage District	Klamath	Fort Klamath	Drainage	2,689
Moorea Drive Special Road District	Douglas	Roseburg	Road	3,250
Little Muddy Creek Water Control	Linn	Harrisburg	Water Control	3,600
Salmon River Park Water Improvement District	Clackamas	Sandy	Water	4,000
Blue River Park & Recreation District	Lane	Blue River	Park & Recreation	4,250
Rainier Drainage Improvement Company	Columbia	Rainier	Drainage	4,330
Poe Valley Park & Recreation District	Klamath	Klamath Falls	Park & Recreation	4,460
Labish Village Sewage & Drainage	Marion	Salem	Sanitary	4,630
McDonald Forest Estates Special Road District	Benton	Corvallis	Road	4,725
Westwood Village Road District	Lincoln	Tidewater	Road	5,000
West Labish Drainage & Water Control Improvement District	Marion	Salem	Drainage	5,000
Darley Drive Special Road District	Douglas	Roseburg	Road	5,525
Little Nestucca Drainage District	Tillamook	Cloverdale	Drainage	5,600
Rink Creek Water District	Coos	Coquille	Water	6,000
Surfland Road District	Lincoln	South Beach	Road	6,000
Lake Point Special Road District	Lincoln	Neotsu	Road	6,500
Silver Sands Special Road District	Lincoln	Seal Rock	Road	6,627
Cedar Crest Special Road District	Coos	Coos Bay	Road	7,000
Modoc Point Sanitary District	Klamath	Chiloquin	Sanitary	7,000
Idaho Point Special Road District	Lincoln	South Beach	Road	7,605
Vineyard Mountain Park & Recreation District	Benton	Corvallis	Park & Recreation	7,720
Pioneer District Improvement Company	Klamath	Klamath Falls	Irrigation	8,000
Carmel Beach Water District	Lincoln	Newport	Water	8,000
Elkton Estates Phase II Special Road District	Douglas	Elkton	Road	8,250
Berndt Subdivision Water Improvement District	Columbia	Vernonia	Water	8,294
Ridgewood Road District	Benton	Corvallis	Road	8,350
Boulder Creek Retreat Special Road District	Lincoln	Otis	Road	8,500
Ridgewood District Improvement Company	Benton	Corvallis	Water	8,795
Country Club Water District	Clackamas	Brightwood	Water	9,740
Cedar Trails Special Road District	Klamath	Keno	Road	9,800
Pine Flat District Improvement Company	Klamath	Dairy	Drainage	9,827
Goldfinch Road District	Klamath	Bonanza	Road	10,000
Hidden Valley Special Road District	Benton	Philomath	Road	11,230
Apple Rogue District Improvement Company	Josephine	Grants Pass	Water	11,500
Woodland Park Special Road District	Klamath	Chiloquin	Road	11,989
Pacific Riviera #3 Special Road District	Coos	Bandon	Road	12,149
Pleasant Hill R.F.P.D.	Lane	Pleasant Hill	Fire / Ambulance	12,250
Goshen R.F.P.D.	Lane	Eugene	Fire / Ambulance	12,500
Clatskanie Drainage Improvement Company	Columbia	Clatskanie	Drainage	12,700
Baker Riverton Road District	Coos	Coquille	Road	12,706
Wauna Water District	Columbia	Westport	Water	14,400
Sleepy Hollow Water District	Clackamas	Brightwood	Water	15,000
Woods Road District	Coos	Coquille	Road	15,775
Merlin Community Park District	Josephine	Merlin	Park & Recreation	16,200
Westwood Hills Road District	Benton	Corvallis	Road	17,000
Antelope Meadows Special Road District	Klamath	La Pine	Road	17,400
Starr Creek Road District	Lincoln	Yachats	Road	17,500
Belle Mer S.I.G.L. Tracts Special Road District	Lincoln	Depoe Bay	Road	18,170
Rosewood Estates Road District	Benton	Philomath	Road	19,638
Coaledo Drainage District	Coos	Coquille	Drainage	20,000
Miroco Special Road District	Lincoln	Depoe Bay	Road	20,000

Panther Creek Road District	Lincoln	Otis	Road	20,000
Dean Minard Water District	Coos	Coquille	Water	20,889
Merrill Cemetery Maintenance District	Klamath	Merrill	Cemetery	21,000
Lookingglass Olalla Water Control District	Douglas	Roseburg	Water Control	21,454
Powers Health District	Coos	Powers	Hospital / Health	21,550
Jack Pine Village Special Road District	Klamath	Gilchrist	Road	21,599
Carlson Primrose Special Road District	Coos	North Bend	Road	22,099
Suburban Lighting District	Klamath	Klamath Falls	Miscellaneous	23,150
Westridge Water District	Lane	Westfir	Water	23,440
Millicoma River Park & Recreation District	Coos	Allegany	Park & Recreation	23,700
Country Club Estates Special Water District	Coos	Coos Bay	Water	24,000
Cammann Road District	Coos	Coos Bay	Road	24,400
Southview Improvement District	Lane	Florence	Water	24,859
Siletz Keys Sanitary District	Lincoln	Gleneden Beach	Sanitary	25,000
Queener Irrigation Improvement District	Linn	Scio	Irrigation	25,000
Shoreline Sanitary District	Clatsop	Warrenton	Sanitary	25,500
River Pines Estates Special Road District	Klamath	La Pine	Road	26,000
West Lane Emergency Operations Group	Lane	Florence	Miscellaneous	26,750
Skyline View District Improvement Company	Klamath	Klamath Falls	Water	26,800
Juno Nonprofit Water Improvement District	Tillamook	Tillamook	Water	27,627
Milo Volunteer Fire Department	Douglas	Days Creek	Fire / Ambulance	27,665
Trask Drainage District	Tillamook	Tillamook	Drainage	27,819
Gleneden Beach Special Road District	Lincoln	Gleneden Beach	Road	28,465
Tiller R.F.P.D.	Douglas	Tiller	Fire / Ambulance	29,000
Nedonna R.F.P.D.	Tillamook	Rockaway Beach	Fire / Ambulance	29,414
Pine Grove Irrigation District	Klamath	Klamath Falls	Irrigation	29,700
Bar L Ranch Road District	Douglas	Glide	Road	30,000
Gardiner R.F.P.D.	Douglas	Gardiner	Fire / Ambulance	30,360
McKenzie Palisades Water Supply Corporation	Lane	Vida	Water	30,663
Poe Valley Improvement District	Klamath	Klamath Falls	Irrigation	30,951
Riverside Water District	Clackamas	Sandy	Water	31,700
Tillamook Bay Flood Improvement District	Tillamook	Tillamook	Water	31,750
Days Creek R.F.P.D.	Douglas	Days Creek	Fire / Ambulance	33,000
Keno Pines Road District	Klamath	Keno	Road	33,000
Newberry Estates Special Road District	Klamath	La Pine	Road	33,050
Bridge R.F.P.D.	Coos	Myrtle Point	Fire / Ambulance	33,124
Tigard Water District	Washington	Portland	Water	33,179
Mossy Brae Water District	Clackamas	West Linn	Water	35,320
Pine Grove Water District-Klamath Falls	Klamath	Klamath Falls	Water	35,760
Three Rivers Ranch Road District	Tillamook	Hebo	Road	35,992
Klamath Falls Forest Estates Special Road District Unit #2	Klamath	Bonanza	Road	37,000
Salmonberry Trail Intergovernmental Agency	Marion	Portland	Miscellaneous	37,000
For Far Road District	Lincoln	South Beach	Road	38,000
Myrtle Creek R.F.P.D.	Douglas	Myrtle Creek	Fire / Ambulance	38,150
Keno Irrigation District	Klamath	Klamath Falls	Irrigation	39,437
Fairview R.F.P.D.	Coos	Coquille	Fire / Ambulance	39,450
Sutherlin Valley Recreation District	Douglas	Sutherlin	Park & Recreation	39,800
John Day Water District	Clatsop	Astoria	Water	40,000
Blodgett-Summit R.F.P.D.	Benton	Blodgett	Fire / Ambulance	41,010
Midland Drainage Improvement District	Columbia	Clatskanie	Drainage	42,160
Upper Cleveland Rapids Road District	Douglas	Winchester	Road	42,710
Forest Grove R.F.P.D.	Washington	Forest Grove	Fire / Ambulance	45,000
Mt. Laki Cemetery District	Klamath	Midland	Cemetery	45,400
Bly R.F.P.D.	Klamath	Bly	Fire / Ambulance	46,015
Calapooia R.F.P.D.	Douglas	Sutherlin	Fire / Ambulance	48,150
Riverbend Riverbank Water Improvement District	Clackamas	West Linn	Water	48,578
Fat Elk Drainage District	Coos	North Bend	Drainage	49,680
Asbahr-Pilkington Road District	Benton	Corvallis	Road	50,000

Klamath River Acres Special Road District	Klamath	Keno	Road	50,000
Bayshore Special Road District	Lincoln	Waldport	Road	50,000
Lost Creek Park Special Road District	Lincoln	South Beach	Road	50,000
Kilchis Water District	Tillamook	Tillamook	Water	51,545
Pine Grove Highlands Special Road District	Klamath	Klamath Falls	Road	51,575
Two Rivers North Special Road District	Klamath	Crescent	Road	53,000
Falcon-Cove Beach Water District	Clatsop	Arch Cape	Water	54,150
Beaver Slough Drainage District	Coos	Coos Bay	Drainage	54,250
Alsea R.F.P.D.	Benton	Alsea	Fire / Ambulance	54,500
Chinook Drive Special Road District	Benton	Corvallis	Road	54,835
Chiloquin Vector Control District	Klamath	Chiloquin	Vector	56,250
Malin Community Cemetery Maintenance District	Klamath	Malin	Cemetery	56,420
Elkton R.F.P.D.	Douglas	Elkton	Fire / Ambulance	57,700
Kellogg Rural Fire District	Douglas	Sutherlin	Fire / Ambulance	62,354
Blue River Water District	Lane	Blue River	Water	62,375
Little Switzerland Special Road District	Lincoln	Tidewater	Road	62,480
Lake Labish Water Control District	Marion	Brooks	Water Control	62,700
Yoncalla Park & Recreation District	Douglas	Yoncalla	Park & Recreation	63,398
Star Satellite Improvement District	Washington	Banks	Water	63,865
Willamette River Water Coalition	Washington	Beaverton	Water	66,500
Dora-Sitkum R.F.P.D.	Coos	Myrtle Point	Fire / Ambulance	66,528
Hoskins-Kings Valley R.F.P.D.	Benton	Philomath	Fire / Ambulance	67,780
Lookingglass Rural Fire District	Douglas	Roseburg	Fire / Ambulance	68,355
Poe Valley Vector Control District	Klamath	Klamath Falls	Vector	68,950
Otter Rock Water District	Lincoln	Otter Rock	Water	71,256
Union Gap Water District	Douglas	Oakland	Water	71,350
Sundown Sanitation District	Clatsop	Warrenton	Sanitary	73,884
Klamath County Fire District #5	Klamath	Bonanza	Fire / Ambulance	75,030
Sumner R.F.P.D.	Coos	Coos Bay	Fire / Ambulance	75,522
Bandon Cranberry Water Control District	Coos	Bandon	Water Control	77,759
Westport-Wauna R.F.P.D.	Clatsop	Westport	Fire / Ambulance	78,600
Row River Valley Water District	Lane	Dorena	Water	79,965
Azalea R.F.P.D.	Douglas	Azalea	Fire / Ambulance	80,200
Alder Creek-Barlow Water District No. 29	Clackamas	Sandy	Water	82,000
Glendale R.F.P.D.	Douglas	Glendale	Fire / Ambulance	82,350
Bonanza Big Springs Park & Recreation District	Klamath	Bonanza	Park & Recreation	82,948
Lamontai Improvement District	Lane	Cottage Grove	Water	83,926
Malin R.F.P.D.	Klamath	Malin	Fire / Ambulance	84,750
Southwood Park Water District	Clackamas	Lake Grove	Water	85,310
Bly Vector Control District	Klamath	Bly	Vector	85,325
Scottsburg R.F.P.D.	Douglas	Scottsburg	Fire / Ambulance	86,800
Greenacres R.F.P.D.	Coos	Coos Bay	Fire / Ambulance	88,410
Swishhome-Deadwood R.F.P.D.	Lane	Swishhome	Fire / Ambulance	88,850
Two Rivers S.W.C.D.	Josephine	Grants Pass	Soil & Water Conserv	89,443
Bonanza Memorial Park Cemetery District	Klamath	Bonanza	Cemetery	90,200
Klamath County Fire District #3	Klamath	Sprague River	Fire / Ambulance	95,550
Mapleton Fire Department	Lane	Mapleton	Fire / Ambulance	95,590
Olney-Walluski Fire & Rescue District	Clatsop	Astoria	Fire / Ambulance	97,430
Beaver Drainage Improvement Company, Inc.	Columbia	Clatskanie	Drainage	97,927
Camas Valley R.F.P.D.	Douglas	Camas Valley	Fire / Ambulance	98,016
Vineyard Mountain Special Road District	Benton	Corvallis	Road	98,150
Shangri-La Water District	Lane	Walterville	Water	98,190
Kerby Water District	Josephine	Kerby	Water	98,400
Wood River District Improvement Company	Klamath	Medford	Irrigation	99,111
Klamath Interoperability Radio Group	Klamath	Klamath Falls	Communications	100,000
Beaver Creek Water Control District	Marion	Aumsville	Water Control	100,342
Union Gap Sanitary District	Douglas	Oakland	Sanitary	100,900
Clatsop County S.W.C.D.	Clatsop	Astoria	Soil & Water Conserv	102,196

Tone Water District	Tillamook	Tillamook	Water	103,820
Merrill R.F.P.D.	Klamath	Merrill	Fire / Ambulance	104,800
Warrenton R.F.P.D.	Clatsop	Warrenton	Fire / Ambulance	105,221
Bonanza R.F.P.D.	Klamath	Bonanza	Fire / Ambulance	105,368
Wolf Creek R.F.P.D.	Josephine	Wolf Creek	Fire / Ambulance	106,818
Elsie-Vinemaple R.F.P.D. #11	Clatsop	Seaside	Fire / Ambulance	107,863
Port of Coquille River	Coos	Myrtle Point	Port	110,320
Rock Creek Water District	Polk	Grand Ronde	Water	110,783
Lake Creek R.F.P.D. - Lane County	Lane	Blachly	Fire / Ambulance	111,200
Monitor R.F.P.D.	Marion	Woodburn	Fire / Ambulance	111,500
Lorane R.F.P.D.	Lane	Lorane	Fire / Ambulance	111,650
Willow Dale Water District	Clatsop	Astoria	Water	111,900
Winchester Bay R.F.P.D.	Douglas	Winchester Bay	Fire / Ambulance	117,022
Klamath S.W.C.D.	Klamath	Klamath Falls	Soil & Water Conser	119,309
Lower Siletz Water District	Lincoln	Lincoln City	Water	119,900
Grand Prairie Water Control District	Linn	Albany	Water Control	121,875
East Valley Water District	Marion	Mount Angel	Irrigation	122,000
Long Prairie Water District	Tillamook	Tillamook	Water	128,260
Cloverdale Sanitary District	Tillamook	Cloverdale	Sanitary	128,850
CHR District Improvement Company	Tillamook	Otis	Water	130,629
Siuslaw S.W.C.D.	Lane	Florence	Soil & Water Conser	133,334
Estacada Cemetery Maintenance District	Clackamas	Estacada	Cemetery	135,950
Gates R.F.P.D.	Marion	Gates	Fire / Ambulance	138,930
Cloverdale Water District	Tillamook	Cloverdale	Water	141,150
North Douglas Library District	Douglas	Drain	Library	142,950
Beverly Beach Water District	Lincoln	Newport	Water	143,485
Bailey-Spencer R.F.P.D.	Lane	Eugene	Fire / Ambulance	146,300
Hazeldell Rural Fire District	Lane	Oakridge	Fire / Ambulance	149,180
Marcola Water District	Lane	Springfield	Water	149,550
Klamath Basin Improvement District	Klamath	Klamath Falls	Irrigation	152,087
Greenberry Irrigation District	Benton	Corvallis	Irrigation	152,988
Sandpiper Village Special Road District	Lincoln	Waldport	Road	154,217
North Lincoln Health District	Lincoln	Lincoln City	Hospital / Health	155,000
Oakland R.F.P.D.	Douglas	Oakland	Fire / Ambulance	155,561
Falcon Heights Water and Sewer	Klamath	Klamath Falls	Sanitary	157,981
Klamath County Predatory Animal Control District	Klamath	Merrill	Vector	158,000
Gardiner Sanitary District	Douglas	Gardiner	Sanitary	161,500
Watseco-Barview Water District	Tillamook	Rockaway	Water	164,020
North Lebanon Water Control District	Linn	Lebanon	Water Control	164,209
Umpqua S.W.C.D.	Douglas	Reedsport	Soil & Water Conser	164,538
Illinois Valley S.W.C.D.	Josephine	Cave Junction	Soil & Water Conser	165,000
Linn S.W.C.D.	Linn	Tangent	Soil & Water Conser	166,857
Tillamook Lightwave IGA	Tillamook	Tillamook	Public Utility	171,219
Canyonville South Umpqua Fire District	Douglas	Canyonville	Fire / Ambulance	171,575
Lacomb Irrigation District	Linn	Lebanon	Irrigation	172,150
South Santiam River Water Control District	Marion	Jefferson	Water Control	177,730
Fargo Interchange Service District	Marion	Salem	Miscellaneous	178,065
Beaver Water District	Tillamook	Cloverdale	Water	178,500
Klamath County Fire District #4	Klamath	Klamath Falls	Fire / Ambulance	180,150
Lane Rural Fire And Rescue	Lane	Veneta	Fire / Ambulance	183,100
Bly Water And Sanitary District	Klamath	Bly	Sanitary	187,500
Panther Creek Water District	Lincoln	Otis	Water	190,000
Mary's River Estates Road District	Benton	Philomath	Road	192,000
Drakes Crossing R.F.P.D.	Marion	Silverton	Fire / Ambulance	193,250
Port of Nehalem	Tillamook	Nehalem	Port	193,310
Modoc Point Irrigation District	Klamath	Chiloquin	Irrigation	194,850
Lower Umpqua Park & Recreation District	Douglas	Reedsport	Park & Recreation	200,100
Crescent Water Supply And Improvement District	Klamath	Crescent	Water	203,100

Dexter Sanitary District	Lane	Dexter	Sanitary	205,555
Santa Clara Water District	Lane	Springfield	Water	206,420
Economic Development Council of Tillamook County	Tillamook	Tillamook	Miscellaneous	209,645
Colton Water District #11	Clackamas	Colton	Water	222,709
Government Camp Road District	Clackamas	Government Camp	Road	225,325
Jefferson Park & Recreation District	Marion	Jefferson	Park & Recreation	226,772
Coquille R.F.P.D.	Coos	North Bend	Fire / Ambulance	227,400
Rainier Cemetery District	Columbia	Clatskanie	Cemetery	227,500
Crescent Sanitary District	Klamath	Crescent	Sanitary	230,880
Hamlet R.F.P.D.	Clatsop	Seaside	Fire / Ambulance	231,950
Mapleton Water District	Lane	Mapleton	Water	232,920
Tenmile R.F.P.D.	Douglas	Tenmile	Fire / Ambulance	235,200
Mill City R.F.P.D. #2-303	Marion	Mill City	Fire / Ambulance	236,700
Oregon P.U.D. Association	Lane	Eugene	Miscellaneous	242,750
Merrill Park District	Klamath	Merrill	Park & Recreation	245,000
Lower Umpqua Library District	Douglas	Reedsport	Library	245,400
North Douglas Park & Recreation District	Douglas	Drain	Park & Recreation	246,100
Mulino Water District #1	Clackamas	Mulino	Water	248,950
East Lincoln County Fire And Rescue	Lincoln	Toledo	Fire / Ambulance	252,700
Millington R.F.P.D. #5	Coos	Coos Bay	Fire / Ambulance	254,417
Bonanza-Langell Valley Vector Control District	Klamath	Bonanza	Vector	255,000
Ash Creek Water Control District	Polk	Independence	Water Control	258,110
Riddle Fire Protection District	Douglas	Riddle	Fire / Ambulance	258,250
North Bay R.F.P.D. #9	Coos	North Bend	Fire / Ambulance	258,500
Central Cascades Fire and EMS	Klamath	Crescent Lake	Fire / Ambulance	262,200
Shelley Road Crest Acres Water District	Coos	Coquille	Water	273,734
Tri City R.F.P.D. #4	Douglas	Myrtle Creek	Fire / Ambulance	278,775
Clatskanie Library District	Columbia	Clatskanie	Library	282,763
Government Camp Sanitary District	Clackamas	Government Camp	Sanitary	286,390
Neah-Kah-Nie Water District	Tillamook	Nehalem	Water	287,572
Cornelius R.F.P.D.	Washington	Cornelius	Fire / Ambulance	289,000
Lakeside R.F.P.D. #4	Coos	Lakeside	Fire / Ambulance	290,950
Scappoose Drainage Improvement Company	Columbia	Scappoose	Drainage	292,104
Columbia County 4-H & Extension Service District	Columbia	St. Helens	County Service	293,000
Hauser R.F.P.D.	Coos	North Bend	Fire / Ambulance	293,000
Siletz R.F.P.D.	Lincoln	Siletz	Fire / Ambulance	298,760
Miles Crossing Sanitary Sewer District	Clatsop	Astoria	Sanitary	302,000
Devils Lake Water Improvement District	Lincoln	Lincoln City	Miscellaneous	303,800
Malin Community Park & Recreation District	Klamath	Malin	Park & Recreation	304,550
Brooks Community Service District	Marion	Salem	Sanitary	307,030
Seal Rock R.F.P.D.	Lincoln	Seal Rock	Fire / Ambulance	308,700
Chemult R.F.P.D.	Klamath	Chemult	Fire / Ambulance	309,900
Upper McKenzie R.F.P.D.	Lane	McKenzie Bridge	Fire / Ambulance	310,000
Hebo Joint Water-Sanitary Authority	Tillamook	Hebo	Water	315,000
St. Paul R.F.P.D.	Marion	St. Paul	Fire / Ambulance	315,033
Newport R.F.P.D.	Lincoln	Newport	Fire / Ambulance	327,760
Western Lane Ambulance District	Lane	Florence	Fire / Ambulance	330,500
Zumwalt R.F.P.D.	Lane	Eugene	Fire / Ambulance	338,152
Sutherlin Water Control District	Douglas	Sutherlin	Water Control	343,753
Arch Cape Sanitary District	Clatsop	Arch Cape	Sanitary	344,250
Central Coos Fire & Rescue	Coos	Coos Bay	Fire / Ambulance	350,163
Horsefly Irrigation District	Klamath	Bonanza	Irrigation	350,210
Enterprise Irrigation District	Klamath	Klamath Falls	Irrigation	359,168
Salishan Sanitary District	Lincoln	Lincoln City	Sanitary	361,222
Bunker Hill Sanitary District	Coos	Coos Bay	Sanitary	377,200
Malin Irrigation District	Klamath	Malin	Irrigation	378,120
Idanha-Detroit Rural Fire Protection District	Marion	Idanha	Fire / Ambulance	380,000
River Road Water District	Lane	Eugene	Water	387,840

Eugene R.F.P.D. # 1	Lane	Eugene	Fire / Ambulance	391,900
Arch Cape Domestic Water Supply District	Clatsop	Arch Cape	Water	393,494
Scappoose Public Library District	Columbia	Scappoose	Library	420,350
Brownsville R.F.P.D.	Linn	Brownsville	Fire / Ambulance	424,900
Port of Alsea	Lincoln	Waldport	Port	432,905
Gearhart R.F.P.D.	Clatsop	Gearhart	Fire / Ambulance	433,000
Clatskanie Park & Recreation District	Columbia	Clatskanie	Park & Recreation	433,000
Dexter R.F.P.D.	Lane	Dexter	Fire / Ambulance	443,693
Siuslaw Valley Fire and Rescue	Lane	Florence	Fire / Ambulance	448,933
Lincoln S.W.C.D.	Lincoln	Newport	Soil & Water Conser	451,598
Josephine County 4-H & Extension Service District	Josephine	Grants Pass	Miscellaneous	452,461
Adair R.F.P.D.	Benton	Corvallis	Fire / Ambulance	454,272
Port of Umpqua	Douglas	Reedsport	Port	464,900
Dallas Cemetery District #4	Polk	Dallas	Cemetery	468,120
Lyons-Mehama Water District	Linn	Lyons	Water	471,014
Lane Library District	Lane	Creswell	Library	472,507
Fairview Water District	Tillamook	Tillamook	Water	472,950
Marion County Extension & 4H Service District	Marion	Salem	Miscellaneous	475,651
Williams R.F.P.D.	Josephine	Williams	Fire / Ambulance	480,900
Colton R.F.P.D.	Clackamas	Colton	Fire / Ambulance	500,350
Rocky Point Fire & EMS	Klamath	Klamath Falls	Fire / Ambulance	505,465
North Albany R.F.P.D.	Linn	Albany	Fire / Ambulance	513,776
Greater Toledo Pool Recreation District	Lincoln	Toledo	Park & Recreation	514,800
Glenwood Water District	Lane	Springfield	Water	523,050
Crescent R.F.P.D.	Klamath	Gilchrist	Fire / Ambulance	525,076
Lowell R.F.P.D.	Lane	Lowell	Fire / Ambulance	525,195
Winchester Bay Sanitary District	Douglas	Winchester Bay	Sanitary	527,750
Coburg Fire District	Lane	Coburg	Fire / Ambulance	534,500
Glendale Ambulance District	Douglas	Glendale	Fire / Ambulance	542,385
Glide R.F.P.D.	Douglas	Glide	Fire / Ambulance	548,718
Halsey-Shedd R.F.P.D.	Linn	Halsey	Fire / Ambulance	552,700
Wiard Memorial Park District	Klamath	Klamath Falls	Park & Recreation	557,000
Scio R.F.P.D.	Linn	Scio	Fire / Ambulance	560,943
Glide - Idleyld Sanitary District	Douglas	Glide	Sanitary	562,500
Willakenzie R.F.P.D.	Lane	Springfield	Fire / Ambulance	569,015
Harrisburg Fire And Rescue	Linn	Harrisburg	Fire / Ambulance	577,200
Neskowin Regional Sanitary Authority	Tillamook	Neskowin	Sanitary	577,325
Twin Rocks Sanitary District	Tillamook	Rockaway Beach	Sanitary	588,660
Neskowin Regional Water District	Tillamook	Neskowin	Water	589,291
Wickiup Water District	Clatsop	Astoria	Water	589,975
Columbia Drainage Vector Control	Columbia	St. Helens	Vector	591,063
Lewis & Clark R.F.P.D.	Clatsop	Astoria	Fire / Ambulance	628,600
Tillamook County S.W.C.D.	Tillamook	Tillamook	Soil & Water Conser	638,532
Monroe R.F.P.D.	Benton	Monroe	Fire / Ambulance	643,044
Basin Ambulance Service District	Klamath	Malin	Fire / Ambulance	654,472
McNulty Water P.U.D.	Columbia	St. Helens	Water	660,225
Palatine Hill Water District	Clackamas	Lake Oswego	Water	665,820
Benton S.W.C.D.	Benton	Corvallis	Soil & Water Conser	668,214
Netarts Water District	Tillamook	Netarts	Water	670,650
Hubbard R.F.P.D.	Clackamas	Hubbard	Fire / Ambulance	671,198
Grand Ronde Sanitary District	Polk	Dallas	Sanitary	676,200
Greater St. Helens Aquatic District	Columbia	St. Helens	Park & Recreation	688,600
Oceanside Water District	Tillamook	Oceanside	Water	699,250
Coos S.W.C.D.	Coos	Coquille	Soil & Water Conser	704,300
Clackamas River Water Providers	Clackamas	Oregon City	Water	704,430
Youngs River-Lewis & Clark Water District	Clatsop	Astoria	Water	707,005
Fern Ridge Public Library District	Lane	Veneta	Library	735,705
Molalla Aquatic District	Clackamas	Molalla	Park & Recreation	739,876

Pacific Communities Health District	Lincoln	Newport	Hospital / Health	741,864
Polk S.W.C.D.	Polk	Dallas	Soil & Water Conservation	752,420
Josephine County 911 Agency	Josephine	Grants Pass	Communications	753,013
Vernonia R.F.P.D.	Columbia	Vernonia	Fire / Ambulance	754,010
Upper Willamette S.W.C.D.	Lane	Eugene	Soil & Water Conservation	759,557
Shasta View Irrigation District	Klamath	Malin	Irrigation	764,595
Netarts-Oceanside R.F.P.D.	Tillamook	Netarts	Fire / Ambulance	777,774
Langell Valley Irrigation District	Klamath	Bonanza	Irrigation	786,000
South Central Oregon Economic Development District	Klamath	Klamath Falls	Miscellaneous	787,779
Willamette River Water Intake Facilities Commission	Washington	Beaverton	Water	791,900
Mohawk Valley R.F.P.D.	Lane	Marcola	Fire / Ambulance	799,204
Mist-Birkenfeld R.F.P.D.	Columbia	Mist	Fire / Ambulance	802,050
Santiam Water Control District	Marion	Stayton	Water Control	811,330
Port of Bandon	Coos	Bandon	Port	822,700
Lebanon Aquatic District	Linn	Lebanon	Park & Recreation	833,300
Klamath Vector Control District	Klamath	Klamath Falls	Vector	836,738
Boring Water District #24	Clackamas	Boring	Water	837,456
Klamath County Drainage Service District	Klamath	Klamath Falls	County Service	850,264
Lyons R.F.P.D.	Linn	Lyons	Fire / Ambulance	855,820
Lakeside Water District	Coos	Lakeside	Water	888,000
Rivergrove Water District	Clackamas	Lake Oswego	Water	912,100
Klamath County Extension Service District	Klamath	Klamath Falls	County Service	915,879
Linn County Emergency Telephone Agency	Linn	Albany	Communications	926,500
Central Oregon Coast Fire & Rescue District	Lincoln	Waldport	Fire / Ambulance	934,089
Tangent R.F.P.D.	Linn	Tangent	Fire / Ambulance	947,210
Aumsville R.F.P.D.	Marion	Aumsville	Fire / Ambulance	964,262
Tillamook Fire District	Tillamook	Tillamook	Fire / Ambulance	982,912
Gaston R.F.P.D.	Washington	Gaston	Fire / Ambulance	994,200
Bandon R.F.P.D.	Coos	Bandon	Fire / Ambulance	1,016,000
Pleasant Hill Goshen Fire & Rescue	Lane	Eugene	Fire / Ambulance	1,018,610
Southwest Lincoln County Water P.U.D.	Lincoln	Waldport	Public Utility	1,028,900
Chiloquin-Agency Lake R.F.P.D.	Klamath	Chiloquin	Fire / Ambulance	1,044,271
Clackamas Regional Water Supply Commission	Clackamas	Happy Valley	Water	1,074,750
Lake Grove R.F.P.D. No. 57	Clackamas	Lake Oswego	Fire / Ambulance	1,097,000
Keno R.F.P.D.	Klamath	Keno	Fire / Ambulance	1,124,350
Charleston Fire District	Coos	Coos Bay	Fire / Ambulance	1,159,700
Port of Siuslaw	Lane	Florence	Port	1,160,677
Willamette Water Supply System	Washington	Beaverton	Water	1,197,410
Silver Falls Library District	Marion	Silverton	Library	1,199,791
Yachats R.F.P.D.	Lincoln	Yachats	Fire / Ambulance	1,207,050
K-GB-LB Water District	Lincoln	Gleneden Beach	Water	1,213,168
Salem Suburban R.F.P.D.	Marion	Salem	Fire / Ambulance	1,227,250
Gleneden Sanitary District	Lincoln	Gleneden Beach	Sanitary	1,281,313
Knappa-Svensen-Burnside R.F.P.D.	Clatsop	Astoria	Fire / Ambulance	1,300,500
Nehalem Bay Fire And Rescue	Tillamook	Nehalem	Fire / Ambulance	1,321,433
Siuslaw Public Library District	Lane	Florence	Library	1,340,098
Columbia River Estuary Study Taskforce	Clatsop	Astoria	Miscellaneous	1,347,259
Klamath Drainage District	Klamath	Klamath Falls	Drainage	1,359,324
South Clackamas Transportation District	Clackamas	Molalla	Transit	1,387,000
Tigard Tualatin Aquatic District	Washington	Portland	Park & Recreation	1,397,500
Sublimity Fire District	Marion	Sublimity	Fire / Ambulance	1,401,998
Port of Garibaldi	Tillamook	Garibaldi	Port	1,431,700
Lake Grove Water District	Clackamas	Lake Oswego	Water	1,461,700
Clackamas County Vector Control District	Clackamas	Oregon City	Vector	1,477,228
Tualatin Valley Irrigation District	Washington	Forest Grove	Irrigation	1,499,700
North Douglas County Fire & EMS	Douglas	Drain	Fire / Ambulance	1,500,568
Josephine Community Library District	Josephine	Grants Pass	Library	1,528,804
Netarts-Oceanside Sanitary District	Tillamook	Tillamook	Sanitary	1,552,610



McKenzie Fire & Rescue	Lane	Leaburg	Fire / Ambulance	1,564,651
Banks Fire District #13	Washington	Banks	Fire / Ambulance	1,582,100
Lincoln County Library District	Lincoln	Newport	Library	1,590,390
North County Recreation District	Tillamook	Nehalem	Park & Recreation	1,619,097
Clackamas 800 Radio Group	Washington	Beaverton	Communications	1,624,702
Winston-Dillard Water District	Douglas	Winston	Water	1,625,700
Heceta Water P.U.D.	Lane	Florence	Water	1,643,583
Charleston Sanitary District	Coos	Charleston	Sanitary	1,696,380
Philomath Fire and Rescue	Benton	Philomath	Fire / Ambulance	1,767,560
Tri-City Water & Sanitary Authority	Douglas	Myrtle Creek	Water	1,788,906
Nehalem Bay Wastewater Agency	Tillamook	Nehalem	Sanitary	1,792,742
Coos County Area Transportation District	Coos	Coos Bay	Transit	1,800,594
Junction City Water Control District	Lane	Junction City	Water Control	1,805,450
Jefferson R.F.P.D.	Marion	Jefferson	Fire / Ambulance	1,852,055
Cannon Beach R.F.P.D.	Clatsop	Cannon Beach	Fire / Ambulance	1,865,908
Pacific City Joint Water-Sanitary Authority	Tillamook	Pacific City	Sanitary	1,866,894
Nestucca R.F.P.D.	Tillamook	Cloverdale	Fire / Ambulance	1,905,905
Rainbow Water District	Lane	Springfield	Water	1,985,000
Junction City R.F.P.D.	Lane	Junction City	Fire / Ambulance	1,990,259
Southwestern Polk County R.F.P.D.	Marion	Dallas	Fire / Ambulance	1,995,000
Turner Fire District	Marion	Turner	Fire / Ambulance	1,999,268
North Clackamas County Water Commission	Clackamas	Milwaukie	Water	2,018,950
Tillamook County Emergency Communications District	Tillamook	Tillamook	Communications	2,066,758
Illinois Valley R.F.P.D.	Josephine	Cave Junction	Fire / Ambulance	2,194,418
Sunset Empire Park & Recreation District	Clatsop	Seaside	Park & Recreation	2,215,437
Suburban East Salem Water District	Marion	Salem	Water	2,234,404
Seal Rock Water District	Lincoln	Seal Rock	Water	2,250,800
Grants Pass Irrigation District	Josephine	Grants Pass	Irrigation	2,281,374
Klamath 9-1-1 Communications District	Klamath	Klamath Falls	Communications	2,293,844
Aurora R.F.P.D.	Clackamas	Aurora	Fire / Ambulance	2,375,150
Silverton R.F.P.D. No. 2	Marion	Silverton	Fire / Ambulance	2,389,293
West Slope Water District	Washington	Portland	Water	2,472,000
Corvallis R.F.P.D.	Benton	Corvallis	Fire / Ambulance	2,502,000
South Suburban Sanitary District	Klamath	Klamath Falls	Sanitary	2,525,162
Columbia S.W.C.D.	Columbia	St. Helens	Soil & Water Conservation	2,585,035
East Salem Service District	Marion	Salem	County Service	2,649,965
Winston-Dillard R.F.P.D.	Douglas	Winston	Fire / Ambulance	2,801,545
Depoe Bay R.F.P.D.	Lincoln	Depoe Bay	Fire / Ambulance	2,839,780
Stayton Fire District	Marion	Stayton	Fire / Ambulance	2,947,166
Marion S.W.C.D.	Marion	Stayton	Soil & Water Conservation	3,228,759
Special Districts Association Of Oregon	Marion	Salem	Miscellaneous	3,245,250
Sweet Home Fire & Ambulance District	Linn	Sweet Home	Fire / Ambulance	3,270,500
Green Area Water & Sanitary Authority	Douglas	Roseburg	Sanitary	3,361,000
Klamath County Library Service District	Klamath	Klamath Falls	Library	3,512,232
Marion Area Multi-Agency Emergency Telecommunications	Marion	Woodburn	Communications	3,513,677
Hoodland Fire District #74	Clackamas	Welches	Fire / Ambulance	3,523,411
River Road Park & Recreation District	Lane	Eugene	Park & Recreation	3,617,754
Estacada R.F.P.D. #69	Clackamas	Estacada	Fire / Ambulance	3,628,738
Port Of St. Helens-Columbia County	Columbia	Columbia City	Port	3,763,832
Clatskanie R.F.P.D.	Columbia	Clatskanie	Fire / Ambulance	3,848,817
South Fork Water Board	Clackamas	Oregon City	Water	3,942,995
Coos County Library Service District	Coos	Coquille	Library	4,041,747
Columbia 911 Communications District	Columbia	St. Helens	Communications	4,042,800
Basin Transit Service Transportation District	Klamath	Klamath Falls	Transit	4,095,165
Port of Tillamook Bay	Tillamook	Tillamook	Port	4,195,040
Clackamas S.W.C.D.	Clackamas	Beavercreek	Soil & Water Conservation	4,206,599
Polk County Fire District #1	Polk	Independence	Fire / Ambulance	4,246,541
Coos County Airport District	Coos	North Bend	Port	4,285,081

Sunset Empire Transportation District	Clatsop	Astoria	Transit	4,384,737
Port of Toledo	Lincoln	Toledo	Port	4,442,585
Molalla R.F.P.D. #73	Clackamas	Molalla	Fire / Ambulance	4,879,375
Tillamook P.U.D.	Tillamook	Tillamook	Public Utility	4,884,572
North Lincoln Fire & Rescue District #1	Lincoln	Lincoln City	Fire / Ambulance	4,972,146
Sandy R.F.P.D. #72	Clackamas	Sandy	Fire / Ambulance	4,989,876
Umpqua Public Transportation District	Douglas	Roseburg	Transit	5,283,105
Woodburn R.F.P.D. No. 6	Marion	Woodburn	Fire / Ambulance	5,402,946
Roseburg Urban Sanitary Authority	Douglas	Roseburg	Sanitary	5,447,084
Scappoose R.F.P.D.	Columbia	Scappoose	Fire / Ambulance	5,749,773
Special Districts Insurance Services	Marion	Salem	Miscellaneous	6,149,000
Port of Astoria	Clatsop	Astoria	Port	6,257,376
Lane Fire Authority	Lane	Veneta	Fire / Ambulance	6,410,528
South Lane County Fire & Rescue	Lane	Cottage Grove	Fire / Ambulance	6,464,857
Western Lane Fire And EMS Authority	Lane	Florence	Fire / Ambulance	6,610,658
Klamath Irrigation District	Klamath	Klamath Falls	Irrigation	6,937,091
Canby R.F.P.D. #62	Clackamas	Canby	Fire / Ambulance	7,516,276
Oregon International Port of Coos Bay	Coos	Coos Bay	Port	7,696,226
Clatskanie P.U.D.	Columbia	Clatskanie	Public Utility	8,989,000
Port of Newport	Lincoln	Newport	Port	9,296,483
Keizer R.F.P.D.	Marion	Keizer	Fire / Ambulance	9,315,447
Lebanon R.F.P.D.	Linn	Lebanon	Fire / Ambulance	9,464,105
Sunrise Water Authority	Clackamas	Happy Valley	Water	9,834,000
Tillamook County Transportation District	Tillamook	Tillamook	Transit	9,964,308
Oak Lodge Water Services Authority	Clackamas	Portland	Water	10,656,553
Tualatin S.W.C.D.	Washington	Hillsboro	Soil & Water Conser	10,662,466
Clackamas River Water	Clackamas	Clackamas	Water	10,896,300
Douglas County Fire District #2	Douglas	Roseburg	Fire / Ambulance	11,287,785
Columbia River PUD	Columbia	Saint Helens	Public Utility	11,721,448
Columbia River Fire & Rescue	Columbia	St. Helens	Fire / Ambulance	12,873,000
Klamath County Fire District #1	Klamath	Klamath Falls	Fire / Ambulance	13,790,070
Water Environment Services	Clackamas	Oregon City	Sanitary	14,458,020
Marion County Fire District #1	Marion	Salem	Fire / Ambulance	14,812,891
Willamalane Park & Recreation District	Lane	Springfield	Park & Recreation	16,816,507
Emerald P.U.D.	Lane	Eugene	Public Utility	20,384,803
Metropolitan Wastewater Management Commission	Lane	Springfield	Sanitary	21,974,894
Springfield Utility Board	Lane	Springfield	Public Utility	25,166,914
Coquille Valley Hospital District	Coos	Coquille	Hospital / Health	32,785,527
Central Lincoln P.U.D.	Lincoln	Newport	Public Utility	34,541,552
Tualatin Valley Water District	Washington	Beaverton	Water	34,626,759
Tualatin Hills Park & Recreation District	Washington	Beaverton	Park & Recreation	47,947,555
Salem Area Mass Transit District	Marion	Salem	Transit	52,940,886
Lane Transit District	Lane	Springfield	Transit	54,800,233
Clackamas County Fire District #1	Clackamas	Milwaukie	Fire / Ambulance	66,940,584
Lower Umpqua Hospital District	Douglas	Reedsport	Hospital / Health	72,289,544
Clean Water Services	Washington	Hillsboro	Sanitary	104,880,900
Tualatin Valley Fire & Rescue	Washington	Tigard	Fire / Ambulance	154,754,856
Bay Area Health District	Coos	Coos Bay	Hospital / Health	210,758,456

My name is MeLynn Vandehey and I am a Forester/Pole buyer for Stella-Jones corp. as well as a small private landowner of 500 acres in Northwest Oregon with 15 years of well-grounded experience in the timber industry. On my personal time, I also enjoy hunting, fishing, and hiking in the ODF state Forests.

After collectively listening to the broad range of live testimony regarding the current proposed HCP plan at the Board of Forestry meeting on June 7<sup>th</sup> in Sisters, Oregon; I would like to provide written testimony opposing the current proposed HCP plan and offer some solutions/feasible alternatives for a revised HCP plan that would provide balance to continually improve habitat and climate changes while still allowing us to manufacture the ever-growing demand of timber in Oregon.

First, why the opposition to the current HCP plan? Well, losing even 5% (30,000 acres) of ODF state timberland for 70 years would no doubt cause the demand for domestic Douglas-fir to skyrocket over the next 20-30 years; especially after losing 1 million acres of merchantable timber in the 2020 fires that are currently being minimally re-planted for the next rotation. With housing prices and demand for housing starts being record-high in Oregon over the past 5 years, we are already facing a detrimental supply shortage of domestic timber while demand continues to increase.

Not to mention, not touching a mature stand of timber for 70 years would result in rot which decreases the value of the stand and is dangerous for recreation, while increasing fire danger due to un-managed fuels. The truth is, we can speak on all sides of this issue, but we all reap the benefits of harvested timber every day. Our homes, furniture, fences, power, paper, toiletries, and the list goes on. Things we are all un-willing to give up or compromise in our lives. So why is the cost landing on the hard-working people who are stewards of the land? The people who are experienced and take great pride in sustainably implementing forest practices to manufacture timber so we can ALL continue to reap the benefits we are unwilling to give up?

Second, the solutions. We all want to protect fish habitat, mitigate soil disturbance, and effectively manage timber while continuing to manufacture a resource we cannot live without. I agree that some kind of HCP plan needs to be implemented, but with better balance for all parts. SO, how do we do it?

1. Forest practice education by highlighting and emphasizing current & future forest practice rules being ADOPTED by the new HCP plan that outline no-cut stream buffers, wetlands, nesting habitat, riparian zones & unstable slopes. Also showing restrictions on clearcut sizes, green-up periods, and seasonal harvest to mitigate erosion. Planting requirements. Forest practices could also be enhanced, Oregon is already doubling stream buffer sizes which should improve fish habitat and improve erosion near streams.
2. To avoid clearcuts in identified critical habitat or steep-slope areas- there are alternatives such as thinning, variable retention harvest or small patch-cutting which allow manufacturing while maintaining shade, habitat, vegetative management, and multi-story stands. Especially if the final harvest rotation age is stretched to allow for increased diversity in stands of timber.
3. Require a longer minimum rotation age for harvest in identified critical habitat areas. Require a minimum 70-80 year rotation (if clearcutting) or final harvest (if thinning) age requirement that will still allow for harvest before the stand rots capitalizing on value and continuing to allow harvest on a longer rotation. This creates diversity across the landscape while considering all parties.

Thank you for allowing me to provide written testimony today and I hope you find some of these ideas beneficial to help achieve an HCP plan that is better balanced for all parties. I can be reached at [REDACTED] if anyone would like to discuss anything further.

**From:** [FORESTRY Boardof \\* ODF](#)  
**To:** [OLIVOS-ROOD Hilary \\* ODF](#)  
**Subject:** Fw: Habitat Conservation Plan  
**Date:** Friday, June 30, 2023 11:19:14 AM

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**From:** Marie Wakefield <[REDACTED]>  
**Sent:** Friday, June 16, 2023 3:17 AM  
**To:** FORESTRY Boardof \* ODF <boardofforestry@odf.oregon.gov>  
**Subject:** Habitat Conservation Plan

1. I recognize and applaud the work of our state and federal agencies in developing a Habitat Conservation Plan for Western Oregon's State Forests. I support Alternative 3: Increased Conservation, as described in the Draft Environmental Impact Statement.
2. I support wider riparian buffers to protect our streams, safeguard water supplies, and provide critical habitat needed to promote the recovery of endangered fish and other aquatic species.
3. Northern Spotted Owl, Marbled Murrelet, red tree vole, and coastal martin populations are threatened and/or endangered as a result of decades of human activity. Modern industrial logging practices have resulted in disturbance, destruction, and fragmentation of mature forest habitat.
4. Conservation Actions 6, 7, 8, and 10 as described in the EIS should be seen as absolute minimum standards needed to protect threatened and endangered species.
5. Protection of interior forests with enclosed canopies and complex structure is critical. Habitat Conservation Areas of adequate size and contiguity are key to survival of terrestrial species such as Marbled Murrelet, Northern Spotted Owl, and coastal marten.
6. ODF should emphasize ecologically focused management of our state timber lands and allow them to become mature, diverse forests that can and will provide highly suitable habitat for threatened and endangered species.
7. ODF must recognize habitat fragmentation as a serious threat to endangered species and should strive to promote habitat connectivity across the landscape.
8. Ecologically focused forest management must include retention of the oldest, largest trees on the landscape during regeneration harvests. Retaining these features on the landscape will eventually result in the stands of old growth needed to provide refuge and dispersal habitat in areas outside of Habitat Conservation Areas.
9. It is time for ODF and the Oregon Board of Forestry to move beyond a timber-centric, business-as-usual approach to forest management.
10. I request that my written comments be part of the record for the June 7, 2023, Board of Forestry meeting.

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*Marie Wakefield*

*Newport, OR*

**From:** [FORESTRY Boardof \\* ODF](#)  
**To:** [OLIVOS-ROOD Hilary \\* ODF](#)  
**Subject:** Fw: BOF June 7, Agenda 1 comment  
**Date:** Thursday, June 15, 2023 1:23:27 PM

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**From:** Oregon Natural Forestry, LLC <[REDACTED]>  
**Sent:** Wednesday, June 14, 2023 3:04 AM  
**To:** FORESTRY Boardof \* ODF <boardofforestry@odf.oregon.gov>  
**Subject:** BOF June 7, Agenda 1 comment

In reference to the adoption of a Habitat Conservation Plan for forests managed by the State Forest Program, Oregon Department of Forestry.

As both a non-industrial forest landowner and one who provides forestry services for the same I do not support the adoption of an HCP for the State Forests as currently configured.

I am David Wells and my primary reasons for this are:

A disruption to the wildfire suppression capacity of the Department.

The reduction of revenue for taxing districts that currently receive timber harvest revenue.

Changing the Oregon Department of Forestry's connection to the communities where the forests are located. As timber harvests are reduced one plan is to have a more centralized work force and employees would flow to the work rather than live where they work.

# Testimony to the Oregon Board of Forestry

## June 7, 2023

Given by: Dennis White as a resident of Oregon.

Affiliation: Board President Friends of Otter Rock Marine Reserve, but not testifying on its behalf

Email: [REDACTED]

Agenda item: Item #1, Public Comment

Thank you, Chair Kelly and Members of the Board, for the opportunity to provide public comment.

I am testifying to urge you to support a strong Habitat Conservation Plan for Western Oregon State Forests.

Please support an enhanced Conservation Alternative that is at least as protective as Conservation Alternative 3, which advances a better path for fish and wildlife, their habitat, and broad conservation values on state-managed public forests that will benefit current and future generations of Oregonians.

Contrary to some messaging that you will hear from industry representatives and their allies who have become allies out of fear triggered by that messaging,

- timber harvests are estimated to increase not decrease under HCP (see NOAA environmental impact statement for HCP, <https://media.fisheries.noaa.gov/2022-03/wosf-hcp-draft-eis-2022.pdf> )
- Timber jobs do not drive the coastal economy and account for under 5% of jobs in the counties with the most timber jobs.
- Timber jobs are estimated to increase, not decrease over the life of HCP (Also see <https://media.fisheries.noaa.gov/2022-03/wosf-hcp-draft-eis-2022.pdf>)

Moreover, the protections provided for in HCP are significant because

- They will ensure healthy state forests, which, if healthy, will adequately support fish and wildlife habitat, drinking water, recreation, carbon sequestration, and climate stabilization. Notably, more than half a million people in NW Oregon get their drinking water from streams and rivers flowing out of state forest land.
- North Coast state forests are a destination for tourist activity that provides half a billion dollars in tourist revenue and 50 million in tax revenue to local communities.
- Oregon residents overwhelmingly place a high priority on fish and wildlife habitat, clean water, and recreation on state lands. (see Oregon Values and Beliefs Center <https://oregonvbc.org/state-forest-management/> )

Oregon Board of Forestry Meeting

June 7, 2023. Sisters, OR

For the record I am Chuck Willer, Executive Director of the Coast Range Association.

[www.coastrange.org](http://www.coastrange.org)

Chair Kelly and members of the Board of Forestry,

Thank you for the opportunity to provide these comments. These comments are revised from the printed comments I submitted to ODF staff June 7<sup>th</sup> in Sisters, OR.

My comments are of four parts.

## 1. The Broader Context of Your Board Service

Please watch the first five minutes of a lecture by professor Damon Silvers, **Understanding Neoliberalism as a System of Power**. Professor Silvers is a Visiting Professor of Practice at the *Institute for Innovation and Public Purpose*, University College London's (UCL).

Since the Reagan revolution and the ascendancy of the neoliberal era, the purpose of government has been hollowed out and its remaining features are left weakened. Now in a post-neoliberal era of crises and need, government struggles to find the resolve and will to meet today's challenges. I believe professor Silver's lecture is relevant to challenges facing the Department of Forestry and the Board's work.

Here is the video's url:

<https://www.youtube.com/watch?v=hLtkJ-AgLuY>

Additionally, Board members will likely find many useful items at the *Institute for Innovation and Public Purpose* website here:

<https://www.ucl.ac.uk/bartlett/public-purpose/>

## 2. New Coast Range Association Report: *Wealth, Income and Oregon's Rural Communities*

I bring to your attention a new report published by the Coast Range Association (CRA) in May titled *Wealth, Income and Oregon's Rural Communities*. The report explains how private timber sales dollars flow through a timber company and end up as someone's income. We explore where the timber dollars are spent and who receives those dollars. We then offer a proposal to keep more timber wealth in local communities.

The report is available on the CRA's website here: <https://coastrange.org/wp-content/uploads/2023/05/Wealth-Income-and-Rural-Communities-sm.pdf>

I'm sure Board members will find useful information in the report relevant to a broad range of policy issues and programs the Oregon Department of Forestry is pursuing.

## 3. State Forest Habitat Conservation Plan (HCP)

The HCP has come under coordinated attack by lumber interests who stand to gain from unwise levels of state forest timber cutting.

Recently, I sent conservation colleagues comments I wrote in 1997 about a proposed habitat conservation plan for state forests. At the time, the state of Oregon, at the behest of the timber industry, conspired with the National Marine Fisheries Service (NMFS) to **not** list the coastal Coho under the Endangered Species Act (ESA) in exchange for Governor Kitzhaber's Oregon Plan.

The Coast Range Association (CRA) and others sued NMFS over the Coho's non-listing. We won in federal court and the coastal Coho was listed. The timber industry had a hissy fit over the listing and declared there would be no further work on western Oregon Habitat Conservation Plans.

The **private forest accord** worked out between various conservation groups and big timber was, in part, a catch up effort to overcome the wood products industry's 1997 ending of HCP work for endangered salmon.

Over the past several years, the Board has made progress on the state forest HCP. Last summer, NMFS issued a Draft Environmental Impact Statement (DEIS) for the HCP. The HCP's proposed timber harvest for all options is in the same range as the state forests average yearly harvest of about 250 million bf between the years 2010 to 2019.



So, why are lumber mill interests and their minions on the north coast now up in arms? Here is my theory of what's going on. I think it boils down to several north coast lumber corporations having more milling capacity than they have timberland. Perhaps all the **investment in automation and high production equipment over the past decade** was premised on a belief that our state forests were to be their corporate tree farm. If so, it's an example of the wood products industry seeing itself entitled. Just because you build large super-efficient sawmills doesn't mean you are entitled to any trees.

I urge the Board of Forestry to stay the course and complete the HCP. A HCP allows for robust timber harvest, more forest carbon sequestered and the provision of necessary habitat for endangered species. Please don't be pushed off course by false issues and imagined problems.

## 4. Forests and Fire

Issues of forest fire was repeatedly brought up by members of the public and some Board members at yesterday's meeting. There are two things I heard yesterday in comments by the public: Issues were alleged that in fact don't exist and issues were stated that in fact are not fixable through the solutions argued.

It looks like the wood products industry is gearing up for a broad attack on public values forest management using the issue of fire. So be it.

I offer one initial thought for what will undoubtedly be a long discussion. The distinction between wet and dry forests is a necessary starting point. Fire suppression in a wet forest does not change the nature of the forest. Fire suppression in a dry forest is highly problematic and changes the nature of the forest ecosystem. We must remember that fire is a natural dimension of all forests.

Just yesterday the news website **Semafor** placed this forest and fire video on their YouTube channel. At about 15 minutes long, the video answers the question raised by the member of the public yesterday who had the Smokey the Bear cutout.

Here is the link to the video: <https://www.youtube.com/watch?v=hyMSPJjULQY>

Thank you for the opportunity to provide these comments.

CC. State Forester Mukumoto

June 4, 2023

Comments to Board of Forestry concerning the HCP.

In 1990, the census showed Deschutes County human population was 74,958. By 2020, it was 198,253. Since 2002, the mule deer population has decreased by 51%. Habitat loss due to development expansion remains the leading cause of deer population declines. For coexistence to succeed, we need to take responsibility for this decline.

Timber sales further fragment migration corridors and usable habitat. For wild ungulates, roads created during logging have a negative impact by exposing them to human disturbances, which affect their health by increasing levels of high stress hormones. This weakens their capacity to fight disease and lowers reproductivity rates. Roads are also very dangerous for wolves, as they are more likely to be hit by cars and scared off by people.

We are very concerned that ongoing logging projects (both on Oregon's public and private lands) will continue to compromise the habitats of all our state's wildlife. In order for true rewilding to happen, the logging incentives must change. While adopting the Habitat Conservation Plan may be a step in the right direction (by limiting commercial logging in some areas) we do not approve of the "take" clause that could further compromise endangered species already on the brink.

Susan Prince & Jennie Sharp  
Wolf Welcome Committee  
Sisters, Oregon