



Council of Forest Trust Land Counties

1212 Court St. NE | Salem, Oregon 97301

March 6, 2024

Forest Trust Land Advisory Committee Board of Forestry Testimony

Commissioner John Sweet, Coos County, Chair - FTLAC:

Chair Kelly, members of the Board of Forestry, State Forester Mukumoto, staff. My name is John Sweet, Coos County Commissioner and Chair of the Forest Trust Land Advisory Committee (FTLAC). Alongside me today are other members of FTLAC, here to fulfill our statutory responsibility to advise the Board of Forestry and the State Forester on matters which affect the management of the State Forest Lands (ORS 526.156).

Board Members, the five of us are before you today as our understanding is this will be the last opportunity we have to address you before the HCP vote occurs tomorrow. We understand our time is limited to just 15 minutes and we will do our best to stay within those parameters.

To start, I am saddened that we are not here today testifying in support of the prepared draft HCP. Since my first FTLAC meeting, almost 11 years ago, we have been hearing about habitat conservation plans and why they are important. Counties have testified many times both before the Board, as well as stated publicly during the FTLAC meetings, the need for a Habitat Conservation Plan. We agree that a Habitat Conservation Plan is needed to ensure compliance with the Endangered Species Act. The problem counties have with this draft, is we do not believe this plan, as drafted, is the right one for all parties.

The Board entered into this HCP conversation on the heels of historic revenues to ensure certainty of financial viability and enhanced habitat conservation. I think everyone would agree the Department has delivered on enhanced habitat conservation, but we seem to have forgotten the first point. There is not, and has not been, certainty for the counties during this HCP conversation. Counties do not have faith that the Department will harvest the volumes projected in the FMP modeling report from December. Board, as you will hear from my colleagues, counties rely on these revenues for our daily operations. We have relied on them to run our schools, public health departments, elections, public safety, and special districts.

Oregon statute is very clear. "FTLAC shall advise the State Board of Forestry and the State Forester on the management of lands and on other matters in which counties may have a responsibility pertaining to forestland. The board and the State Forester shall consult with the committee with regard to such matters." Counties were not provided with a seat on the scoping committee. We were not provided with a seat on the Steering Committee.

If the Department is going to be making decisions on the lands that were deeded to you for management by the counties, counties should have a voice in those decisions. Helping to put the plan together, to ensure counties would be in support, would have been warranted. Counties should have been present today asking for the support of a plan in which everyone was lined up behind it. Unfortunately, that is not the case.

Board, we are happy to take your questions at the end. I would now like to turn it over to Commissioner Bangs, Clatsop County Commissioner and District 2 representative on FTLAC.



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Commissioner Courtney Bangs, FTLAC District 2 – Clatsop County:

Board, for the record my name is Courtney Bangs, and I am a Clatsop County Commissioner and the representative on FTLAC for District 2: Clatsop County.

This HCP will negatively impact, directly or indirectly, all FTLAC counties. The negative impacts will be particularly severe in Clatsop County. The development of an HCP as a tool for ODF to comply with the Endangered Species Act is something many can agree with. The approval of the current draft HCP is not.

Clatsop and Tillamook counties are among the most dependent on the state forests for revenue to fund social services and provide family wage jobs. Instead of trying to develop an HCP that protects county services and jobs in all FTLAC counties, ODF and the Board have continued to push a plan that leaves those most in need with the least. ODF noted that since the release of the draft HCP, it has seen no information, and has heard no testimony that would cause it to change the HCP. That is even after seeing projections of drops in revenue for Clatsop County of close to 40%. ODF originally pitched and pushed the HCP as a plan to gain regulatory certainty, at the cost of about 10% of the timber harvest.

Now, ODF is preparing a plan that reduces harvest by more than three times that original projection with no further explanation and no clear analysis of how the plan meets both the incidental take permit issuance criteria and maintains greatest permanent value. It's ironic that the State Forester's recommendation to you is to discuss trade-offs to inform the setting of performance measures for the FMP, but the department has been unwilling or unable to discuss trade-offs inherent in the HCP. My view is that the tradeoffs in the proposed HCP are now too large. This HCP isn't right for Oregon's State Forests.

In addition, Trust Land County Commissioners are also very concerned about fires and forest health. In the past few years, many western counties have been greatly impacted by large fires, primarily on unmanaged Forest Service land. I'm worried that the same fire risk these lands pose to my community will be posed by the State Forests because of the HCP. I fear that limits on forest management will result in a buildup of fuel that will result in larger, more devastating fires. I'm further concerned that limits on road management will reduce ODF's ability to respond to fires once they start. As a County that's 87% forestland, this is extremely concerning. Lastly, ODF will give up the ability to manage State Forests for forest health concerns after 30 years, as the lands inside HCAs cannot be managed after that time. I can't see what benefit it provides to the people of Oregon for ODF to walk away from half of the State Forest lands and not be able to respond to urgent needs or to maintain forest health.

In southwestern Oregon, we've seen the Forest Service lose the ability to manage forests and we've seen the consequences: large swaths of dead and dying forests across the landscape have created fuel for future conflagrations. Developing a plan that will put more communities at risk by forcing ODF to walk away from managing these lands isn't right for Oregon.

I would now like to turn it over to Commissioner Magruder, Columbia County Commissioner and District 3 representative on FTLAC.



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Commissioner Margaret Magruder, FTLAC District 3 – Clackamas, Columbia, Washington Counties:

Board, for the record my name is Margaret Magruder, and I am a Columbia County Commissioner and the representative on FTLAC for District 3: Columbia, Clackamas, and Washington Counties.

First, we all know that counties receive 63.75% of the revenues generated and the Department's State Forest Division receives the other 36.25%. However, counties do not receive this full 63.75%. We share it with the schools and special districts in our communities. On average, counties only keep 17-20% of the harvest revenues. 60-70% goes to the schools in our communities to ensure the rural portions have the same opportunities as those in the urban areas. The remaining funds are provided to the special districts for their general operations.

Furthermore, the HCP will cause a reduction in the revenues going to the schools, which in turn will see programs being canceled or teachers and staff being laid off. Washington County, one of the three I represent on FTLAC, allocates 68% of the revenues generated through harvest to schools. Based on the December Model, Washington County is looking at a projected revenue reduction, and a significant one. In 2022 Washington County received \$13.3 million, the best-case scenario for Washington County in the modeling report would cause the schools to receive a 66% reduction from 2022.

The Department cannot be left out of this conversation, as 36.25% of all harvest revenues are allocated to the State Forest Division. In Fiscal Year 2023, the Department of Forestry harvested approximately 204 million board feet. ODF retained \$34.6 million as their share in the revenues generated. Assuming the log prices will remain roughly where they are, with a reduction in 50 million board feet, it would not be possible for the Department to remain operational with such a decrease in revenue. They will need to seek funding from the Legislature. This would be the first time that a self-sustaining division of ODF would seek ongoing, perpetual funding from the Legislature.

However, if the Legislature is presented with an option of allocating more revenues to schools, because as I pointed out a moment ago, the schools will be significantly impacted, or funding the Department of Forestry, the Legislature, most likely, will choose the schools – as they have a constitutional requirement to provide the necessary and adequate level of funding to the K-12 schools in Oregon.

Board, there is a way to ensure the Department, Schools, Counties, and Special Districts are not all going to the Legislature with their hands out in future legislative sessions – take the time needed to adjust this HCP recommendation. Counties have thoughts and ideas on where you can make the small necessary tweaks to ensure financial stability for all parties.

Board, please do the right thing. Help us to keep our communities afloat and operational.

I would now like to turn it over to Commissioner Tucker, Linn County Commissioner and District 4 representative on FTLAC.



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Commissioner Will Tucker, FTLAC District 4 – Benton, Lincoln, Linn, Marion, Polk Counties:

Board, for the record my name is Will Tucker and I am a Linn County Commissioner and FTLAC representative for District 4: Linn, Benton, Lincoln, Polk and Marion Counties. In that role, I represent and speak for over 700,000 residents of five trust land counties.

The HCP reduces the harvest from a 10-year average harvest of 250 million board feet per year to a projected average of between 162 and 181 million board feet, according to the December Modeling Report released by the Department. This will result in the loss of jobs across the trust land counties.

But how many jobs will be lost as the harvest level falls by 69 to 88 million board feet? The analysis in the Draft EIS pegs the number of jobs at just 3 per million board feet, as if deliberately trying to hide the impacts of the HCP. The Bureau of Land Management estimates there are 13 jobs supported per million board feet of timber harvest in Oregon.¹ Analysis of federal and state data from Washington State, shows 15 direct jobs are created per million board feet of timber harvest, with a total of 36 jobs per million board feet when considering indirect and induced jobs.² That same analysis found direct wages of \$917,000 per million board feet.

What if we apply those numbers to the loss of harvest due to this HCP? We see losses of at least 1,035 direct jobs and direct payroll losses of \$63 million to \$81 million annually. In total, 3,170 total jobs might be lost. This is in addition to job and payroll losses due to the loss of jobs from the revenue share that supports county services. We are already starting to see the impacts. Harvest levels have already dropped from State Forests as ODF preemptively started implementing the HCP in the current annual plans. Three mills have recently announced closure; resulting in the loss of 183 direct mill jobs.³ This does not include lost logging and trucking jobs, or indirect and induced jobs. The lack of local log supply and the high cost of logs was cited in each case. Without a supply of local logs for local mills, we'll only see more lumber imports from abroad, be it from Canada, Europe, or South America.

The loss of these family wage jobs will reverberate through the community. The loss of family wage jobs with health insurance and retirement kills communities. Communities that today are proud of the environmentally sound jobs and proud of their heritage supplying the wood that builds homes in Oregon. The job losses mean ends of careers, changes to college plans, divorces and even suicides for some with mental health challenges who will lose their livelihood. The cost of this plan will be borne by the family units affected, and they will be severe for many. If implemented without change, the HCP will cause losses that will damage small towns across Oregon and lead to the destruction of some families and communities. Board you must reconsider the HCP.

I would now like to turn it over to Commissioner Skaar, Tillamook County Commissioner, former District 1 representative and current Vice Chair of FTLAC.

¹ BLM (Bureau of Land Management). 2022. Bureau of Land Management Western Oregon Timber Update. Handout provided at the 2022 American Forest Resources Council Annual Meeting 4/20/2022.

² https://data.workingforests.org/doc/WFPA_Industry_Econ_Impacts_2021_b.pdf

³ Hampton Lumber, Banks – 58 jobs; Rosboro, Eugene – 25 jobs; Interfor, Philomath – 100 jobs.



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Commissioner Erin Skaar, Tillamook County, FTLAC Vice Chair:

Board, for the record my name is Erin Skaar, Tillamook County Commissioner and the Vice Chair of FTLAC. FTLAC is comprised of Benton, Clackamas, Clatsop, Columbia, Coos, Douglas, Josephine, Klamath, Lane, Lincoln, Linn, Marion, Polk, Tillamook, and Washington Counties.

I thought it was important to remind you that there are 15 counties, over 130 cities, and tens of thousands of Oregonians that rely on the revenue from these forests for their everyday lives. Board, the purpose of FTLAC coming before you today is to try one last time to express to each of you the impact this decision will have, as presented. First Chair Sweet discussed the disappointment counties had at not being included in putting this plan together. Spending 11 years discussing an HCP, when the time to officially craft this one came, counties were sadly not included. Even though these forest lands were deeded to you for management, and statute says we should be included in the conversations. Commissioner Bangs talked about the impacts that counties will feel if this passes as-is. She also discussed the impacts of not harvesting in a sustainable management style to ensure the events like the Tillamook Burn do not occur again. Commissioner Magruder then talked about the financial impact this draft plan will have on Schools, the state, and the Department. Commissioner Tucker then discussed the economics locally of this plan. The 186 individuals that have lost their jobs when the mills closed. He talked about how additional mills will close if this HCP goes into effect as presently drafted.

The recommendation that will be presented to you tomorrow by State Forester Mukumoto is rather disheartening. First it does not reference the impact this will have on the Trust Land Counties at all. Instead, it talks only about the need for this plan to be in compliance with the ESA. The purpose of **AN** HCP is to be in compliance with the ESA. The State Forester has not shown why **THIS** specific plan is needed. His recommendation does not discuss in any way the effects on the recipients of the revenues, or the multiplier effect this will have on our communities. Second, Counties should be treated and viewed as partners in the management of these forests. We entrusted them to you for long-term management in partnership, however in two years of discussing this plan there have not been any changes made that the counties have requested.

Tomorrow, if you decide to move forward as drafted, our communities will not be the same. More mills will close, and counties will have increased expenses that frankly, we do not know how we will fund. At the end of the day, I think we can all agree that we need to do what is right. Hopefully, you will see that what is right is to take the time, make the changes to ensure our communities will not be left behind, and treat us like the partners we are supposed to be.

Board, we thank you for your time today and again, please, oppose the State Foresters Recommendation and make the changes needed to ensure a plan that all parties can agree to – one that produces the harvest revenues we need to stay operational and the habitat numbers to ensure the protected species have what they need. There is a way to ensure both here, Board we ask that you take the time to explore it.

Thank you and we welcome the opportunity to answer any questions you may have.



BOARD OF COUNTY COMMISSIONERS

PUBLIC SERVICES BUILDING

2051 KAEN ROAD | OREGON CITY, OR 97045

Wednesday, March 6, 2024

Jim Kelly
Chair, Oregon Board of Forestry
Oregon Department of Forestry Headquarters
2600 State Street
Salem, OR 97310

Subject: Letter of Opposition of the Draft Proposed Habitat Conservation Plan

Chair Kelly and Members of the Oregon Board of Forestry,

Thank you for allowing Clackamas County the opportunity to provide feedback on the proposed Draft Habitat Conservation Plan (HCP) and the State Forester's Recommendation. Over time, County Staff and I have sent letters and testified in opposition and are disappointed by the lack of response from the Oregon Board of Forestry to any of our correspondence. Indeed, it feels unorthodox for counties to be ignored when the lands in question are county-owned lands that the state is holding and managing in trust. Seeing no interest by the state to heed the input by the owners of the land, I am personally feeling that the trust is broken.

Clackamas County continues to be concerned about the Draft Proposed HCP and the State Forester's Recommendation. Clackamas County desires to see no reduction in harvest in order to ensure the economic vitality of our forest product industries and communities.

At this time, I would like to reiterate that we stand firm in our opposition of the Draft Proposed HCP and the State Forester's Recommendation. Additionally I request that the Board of Forestry consider modifications to this HCP and delay adoption until all parties, working in partnership can find common ground.

Sincerely,

Mark Shull, Commissioner
Clackamas County



Clatsop County

Board of Commissioners

800 Exchange St., Suite 410
Astoria, OR 97103
(503) 325-1000 phone / (503) 325-8325 fax
www.ClatsopCounty.gov

March 4, 2024

To: Cal Mukumoto, State Forester, Oregon Department of Forestry
Oregon Board of Forestry Members
Federal Services Representatives

From: Clatsop County Board of Commissioners

Subject: *DRAFT WESTERN OREGON STATE FOREST HABITAT CONSERVATION PLAN
(HCP) – COUNTY REQUEST FOR NEW EIS AND PUBLIC COMMENT PROCESS*

The Clatsop County Board of Commissioners has been unanimous in support of an HCP for the western Oregon state forests; and has repeatedly requested the Department of Forestry actively engage with local public officials and District forestry staff to develop a balanced, equitable, fair, and legally defensible HCP that serves environmental, economic and social interests.

It is our understanding, based on publicly available information, that substantive changes have been made to the underlying data and assumptions used to formulate the current draft HCP. Based on publicly available information, we are of the opinion the modifications (in-total) are substantive enough to warrant another draft EIS and public comment process.

Although not a complete representation, the following highlights some of the changes that have occurred since the original release of the draft HCP:

- *The Red Tree Vole has been determined to not warrant additional protections as a covered species.* This impacts the no action alternative, where it was assumed that starting in 2023, there would be a significant rise in covered species primarily as a result of the Spotted Owl and Red Tree Vole. This has already proven to not be the case and instead of additional acres being encumbered by threatened and endangered species there are actually opportunities to free up already encumbered acres having the reverse affect of the assumptions made in the no action alternative.
- *New models have been subsequently established, with new outputs.* The new models have effectively changed the volume for harvest across all the alternatives. The lower volume estimates increase the social and economic impacts – beyond what was captured in the original draft HCP.
 - The downward volume adjustments were not equally applied across all alternatives, as the various alternatives had harvest occurring at different ages and the age of harvest was one of the changes to the model. This impacts how the harvest units

were chosen; thus, changing the environmental impacts within individual watersheds and across the Districts.

- Assumptions listed with modeling results make it clear that key pieces of information that will dramatically change the numbers are still outstanding. Of most importance among them being a change in available acres within the non-HCA areas. This will increase the social impact to these areas specific to alternatives with HCAs.
- New models show that the 70-year commitment to existing habitat has already been met. This information should have informed options whereby habitat acreage could be removed from the models and the economic impacts on ODF and local taxing jurisdictions minimized.
- ODF is struggling to achieve the lower volumes within the new model outputs. Model outputs depend on extensive harvests within the HCAs for the first thirty (30) years. Planned harvest to date do not show this increased harvest within the HCAs. Assurances in public meetings have been made that “sometime” in the next few years harvests will dramatically increase, but no evidence of this has been shown to date.
- ODF is on the record stating the geo-region model that was used for the original model is not viable.
- New Stream data from the Private Forest Accord indicates the underlying data used for the HCP is no longer accurate, nor represents the best available science. This data could alter the stream buffers, which impacts the overall landscape dedicated to conservation vs. production.
- Oregon Department of Forestry is on record stating the HCP will impact the solvency of the state agency. Alternative funding sources, approved by the legislature, will be required to pay for general operating expenses (formerly paid by timber revenue).
 - This changes how ODF funding is described in Chapter 9.
 - This also impacts the analysis of social impact, due to the opportunity cost of a State General Fund bailout. Dedication of state discretionary revenues (General Fund) will reduce revenues available for other priority services and service levels (i.e. housing, homelessness, addiction treatment, public safety, etc.).
 - Chapter 9 currently states ODF is primarily funded by timber sales. It further describes that to fully implement the HCP will only take around seven (7) full time staff. However, this ignores all of the staff that is laying out, administering, and replanting timber sales. The seven staff cannot be paid without these other staff members doing their job. These staff members are all specialists and not field personnel. The work on the HCP will be performed in the field and not in the office. Therefore, it will require more than the noted staff compliment.
 - Without showing the funding for the HCP, the Department of Forestry is not meeting a key requirement of all HCPs.
- ODF is pursuing an HCP through the Forest Resource Unit that will cover Coho. This HCP may be completed prior to the Northwest Oregon State Forest Plan and will likely have significantly lower cost.
- ODF should have a new inventory that will change the numbers related to volume and habitat across the entire plan area (is overdue for completion). The HCP should be informed by the most recent data available.
- Multiple additional changes have been insinuated in public meetings since the release of the last public draft.

- Additional issues that are not covered by the modeling scenarios that are greatly weighted towards the Non-HCA areas of the landscape.
 - Property line issues
 - Scenic Highways
 - In-operable areas (access restricted)

The entire HCP process is intended to thoughtfully consider a range of costs/benefits and balance environmental, economic and social concerns. As the underlying data and assumptions have been substantially modified, the Clatsop County Board of Commissioners respectfully requests a new EIS and public comment process. The Board of Commissioners are committed to an HCP, but are unwavering in our commitment to a plan that is balanced, equitable, fair and legally defensible.

Please consider our request for a new EIS and public comment process.

Respectfully,



Mark Kujala, Chair
Clatsop County Board of Commissioners



Tillamook County Board of Commissioners

201 Laurel Avenue, Tillamook, OR 97141

Phone: 503-842-3403

Mary Faith Bell, Chair
Doug Olson, Vice-Chair
Erin D. Skaar, Commissioner

March 5, 2024

Jim Kelly
Chair, Oregon Board of Forestry
Oregon Department of Forestry Headquarters
2600 State Street
Salem, OR 97310

RE: Letter of Concern Regarding the Proposed Habitat Conservation Plan

Chair Kelly and Members of the Oregon Board of Forestry:

Tillamook County is a Trust Land County that deeded 296,946 acres of our forests, nearly 40% of the entire state forests that exist today, to the state in a partnership for long term management. We are very concerned with both the proposed Draft Habitat Conservation Plan as well as the State Forester's Recommendation. Both are before your Board on Thursday, March 7th.

Local governments and communities like ours have very low property tax rates and have been dependent upon the timber harvest revenues to fund vital county programs and services, as well as schools, and special district operations. These harvests, and resulting local timber products manufacturing, also provide family wage-fully benefited jobs to support a vibrant economy.

The funds collected by local governments from timber harvests (63.75% of the revenue generated) are used to fund everyday aspects of our lives such as schools and fire districts. If the Board chooses to move forward with the recommendation as presented, in Tillamook County, we will likely have to reduce services across all general fund departments. Specific services that will be most impactful to our constituents and visitors include sheriff deputies who currently patrol the roads and respond to emergency situations such as vehicle accidents and break-ins, our planning department that provides building permits to allow additional development and tax growth, and the county clerk's department that is responsible for safe and secure elections.

Oregon Department of Forestry (ODF) originally projected the harvest would be at 250 million board feet (mmbf), the federal services then projected 225mmbf. ODF then revised the projected harvest volume down closer to 185mmbf. The most recent modeling numbers are showing anywhere from 162-181mmbf (page 9 of December modeling report). **Trust Land Counties 10-year harvest average is 250 mmbf.**

In terms of acres available for harvest, Tillamook County will realize a loss of 30% of our harvestable land. We will go from having ~ 95,000 acres constrained by natural geography and conservation to a total of ~184,000 acres constrained. This leaves us with only 38% of our lands available for harvest to support our communities, schools and special districts. Make no mistake, that this is not enough to support the needs of the people of Tillamook County.



Tillamook County Board of Commissioners

201 Laurel Avenue, Tillamook, OR 97141

Phone: 503-842-3403

Mary Faith Bell, Chair
Doug Olson, Vice-Chair
Erin D. Skaar, Commissioner

We believe in and support using good science to ensure the survival of ESA listed species. We simply believe that this plan goes too far in setting aside land for owls and other species where changing science questions if just setting aside more land is equal to species survival. Let's slow down and confirm that this is the right HCP.

We strongly urge the Board of Forestry to consider modifications to this HCP and delay adoption of this Habitat Conservation Plan until all parties can find common ground.

Sincerely,

BOARD OF COMMISSIONERS FOR TILLAMOOK COUNTY, OREGON

Handwritten signature of Mary Faith Bell in blue ink, written over a horizontal line.

Mary Faith Bell, Chair

Handwritten signature of Doug Olson in blue ink, written over a horizontal line.

Doug Olson, Vice-Chair

Handwritten signature of Erin D. Skaar in blue ink, written over a horizontal line.

Erin D. Skaar, Commissioner



Tuesday, March 5th, 2024

Jim Kelly
Chair, Oregon Board of Forestry
Oregon Department of Forestry Headquarters
2600 State Street
Salem, OR 97310

Subject: Letter of Concern Regarding the Proposed Habitat Conservation Plan

Chair Kelly and Members of the Oregon Board of Forestry,

We, the Washington County Board of Commissioners (BOC) are writing to express our deep concerns for the proposed Habitat Conservation Plan (HCP), which is before your Board for consideration later this week.

We recognize that Oregon's economy is dependent on the health of our natural resources, and strongly believe in conservation of our forests and freshwater habitats. As local government officials, we also understand our communities' needs for steady and sufficient resources. Balancing these values is crucial.

Local governments and communities have long been dependent on timber harvest revenues to fund programs, maintain family-wage jobs and keep their local economies vibrant. We are asking for your partnership to help us strategically maintain our timber revenues as you work to implement new conservation policies.

The funds collected by local governments from timber harvests are used for vital services such as schools and fire districts. In Washington County alone, 68% of the money we receive goes to school districts. A loss of these funds will require the state school fund to backfill lost revenues, also resulting in the state school fund having less money to allocate to districts around the state. All Oregon schools will be impacted.

Board of County Commissioners

155 North First Avenue, Suite 300, MS 22, Hillsboro, OR 97124-3072
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To put this into perspective, on average, counties allocate 60% of their revenues to schools. The anticipated deficit to schools from the new HCP across all 15 Trust Counties is roughly \$32.5 million per year, which is the equivalent of “closing” the Banks and Gaston School Districts, which together have an annual budget of \$36.5 million.

These unintended consequences of the proposed HCP are not siloed to how timber harvest funds are allocated. The Oregon Department of Forestry (ODF) projected the 2024 harvest would be 255 million board feet (MMBF). The actual harvest is expected to be 200 MMBF, a reduction of 21%. This reduction will impact communities - three lumber mills have already shut down across the state, leading to a direct loss of 183 jobs. There will be more “indirect” jobs lost. The closure of a lumber mill in the City of Banks, in western Washington County, has led to a direct loss of 58 jobs, with more anticipated from auxiliary industries such as trucking and transportation.

The Oregon Department of Forest (ODF) will also be significantly impacted. This department is a crucial partner for communities threatened by forest fires. At a time when the Legislature is considering difficult revenue-raising options to ensure ODF has all the resources necessary to fight wildfires, the agency will be asking them to also backfill lost revenues.

As local governments grapple with our housing crisis and invest in building more homes, the inevitable rise of lumber prices from lower timber harvests will impact housing affordability and availability.

The Washington County Board of Commissioners are supportive of the development of a Habitat Conservation Plan to better protect our wildlife, land, timber resources, and ecosystems.

However, this *particular* HCP proposal will lead to negative unintended consequences for the people of Washington County and Oregonians across the state who are dependent on critical services funded by timber harvest revenue.

We strongly urge the Board of Forestry to consider modifications to this HCP and delay adoption of this HCP until all parties can find common ground.

We need this HCP to be environmentally successful *and* not devastatingly destructive to the economic health of counties and special districts.

Sincerely,

Board of County Commissioners

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Kathryn Harrington
Chair, At-Large



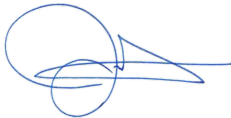
Nafisa Fai
Commissioner, District 1



Pam Treece
Commissioner, District 2



Roy Rogers
Commissioner, District 3



Jerry Willey
Commissioner, District 4

Board of County Commissioners

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