

## Tillamook County



*Land of Cheese, Trees and Ocean Breeze*

Tillamook County Commissioner  
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State Forester Peter Dougherty  
Oregon Board of Forestry  
2600 State Street  
Salem, Oregon 97310  
pdaugherty@odf.state.or.us

RE: Habitat Conservation Plan

Mr. Dougherty and the Oregon Board of Forestry:

I have never been opposed to analyzing the viability of the Habit Conservation Plan (HCP) from a business perspective. However I have several concerns. Topping the list is the time it would take. I'm concerned that an analysis at this time would slow down ODF's progress toward becoming economically viable again.

My understanding is that the proposed grant will fund stakeholder involvement and an economic analysis and will take at least a year to complete (Phase 1). If the process concludes with a HCP recommendation, then another year or more will be spent negotiating with the federal agencies (Phase 2), followed by yet another year or more navigating the federal NEPA process (Phase 3).

Meanwhile, ODF is receiving less revenue than it spends. The process outlined above will take at least three years and we know 2020 is the year when ODF's reserves will be depleted. Any further delays in making a decision to harvest more timber will put ODF into further financial jeopardy.

Wouldn't it be better for ODF and the Board of Forestry to find a way to quickly determine whether the federal agencies are willing to write a HCP that protects aging stands on 70% of the forest that emphasize timber production? If not, then we can quickly decide to pursue a departure from even flow in the State Forest Plan. Immediately using this strategy in an expeditious manner may take no more than two months. ODF is heading for a fiscal cliff yet still maintains the usual strategy of "paralysis by analysis."

The \$750,000 grant will require \$250,000 in matching funds. These are reserves ODF cannot afford to spend. Secondly, if this analysis is funded by spending ODF's Forest Development Fund resources, then I believe the beneficiaries should be consulted. The Trust Counties have a direct financial interest. Tillamook County and the taxing districts should be consulted, not just notified.

Are we approaching this process properly? Wouldn't it be more prudent for the Board of Forestry to first develop a new Forest Management Plan? Then a detailed discussion and analysis of a HCP would appear to be more reasonable.

The Board of Forestry has decided to drop the failed Structure Based Management experiment and rely on a zoning approach. But the forest planning has unfortunately been delayed nearly a year and a half with the ESSA review of inventory and growth and yield. I believe there cannot be a valid economic analysis of a HCP until there is first a final Forest Plan, which would then establish a baseline.

As I understand it, Phase 1 of this HCP analysis will result in another effort to convene stakeholders to gather input. The last time this was done, we spent a considerable amount of time concluding that the stakeholders could agree on very little. I personally found this exercise to be very frustrating and of little value.

ODF's efforts to obtain a reasonable HCP on the Elliott State Forest failed. A considerable amount of time, effort, and money was wasted due to the federal agencies' unwillingness to agree on a reasonable HCP for the Elliott State forest that was acceptable to the School Trust. I'm concerned that a similar effort for the State Forests will lead to the same outcome.

In 2004-2005, ODF evaluated a HCP and found that Take Avoidance provided a superior return. FTLAC asked ODF to demonstrate whether and how the previously proposed HCP would represent a favorable business decision. ODF's own analysis concluded that it did not. That result leads me to question the wisdom of spending another \$250,000 of Forest Development Funds to address the same question. I believe more information is needed at this time in order to determine the likelihood of a different answer before approving the proposed grant.

I'm also concerned about what would happen after ODF spent \$250,000 on a HCP analysis. Wouldn't there be a desire by ODF to attempt to justify this expenditure by concluding a HCP is viable when in fact it might not be?

Decisions about the State Forest Trust Lands must be made in the best interests of the beneficiaries. Tillamook County and all of the relevant taxing districts have a direct financial interest in the outcome of a HCP. As beneficiaries, the State Forest Trust Land Counties must be included in both the discussion and the decision about whether or not to pursue a HCP.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Josi". The signature is fluid and cursive, with a large initial "T" and "J".

Tim Josi  
Tillamook County Commissioner