Forest Trust Land Advisory Committee

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11/01/2017

Oregon Board of Forestry

FTLAC Testimony:

Composition of the HCP Steering Committee:

We want an FTLAC Board Member, selected by FTLAC, on the HCP Steering Committee. This representative will communicate the economic, social and environmental values of importance of our Trust Lands constituents.

Also, we want to ensure that the scope of the HCP recognizes that under the ESA, the State Forest Trust Lands are required to avoid harm of T & E species, which is a lower standard than the recovery duty facing federal land managers.

For these and other reasons listed below, we feel strongly that FTLAC should have a seat on the Steering Committee.

Comments on the FMP/HCP process:

At the April 2017 BOF meeting, FTLAC expressed support for exploring the viability of an HCP from a business perspective.

The process, as outlined by ODF at our recent FTLAC meeting, raises concerns:

- The unbalanced age class distribution of the State Forest Trust Lands is a key issue that must be resolved by a new State Forest Management Plan.
    - Not adequately addressing this issue will result in acres becoming unavailable for harvest due to the Federal Endangered Species Act.
    - The Elliott State Forest serves as an example of what will happen if we don't address this issue.
- The BOF has a duty to maintain and enhance the economic value of our State Forest Trust Land asset. An HCP that assures that ODF would be able to maintain a high level of timber harvest into the future may be one way to meet that duty.

We are concerned about the process ODF intends to pursue leading to a less than favorable HCP.

- ODF intends to work on a single Forest Management Plan strategy at the same time it is working with the federal agencies on an HCP.
- Secondly, ODF has assured us that there will be at least three "off-ramps" if the HCP process does not look like it will come to a favorable conclusion. We are pleased to hear this but have concerns:

- Having both processes running concurrently has risks. With the understanding that adopting a new FMP is critical to restoring ODF's financial health, there is a fear the BOF will be forced to agree to a less than favorable HCP simply to secure "permission" to adopt a less than favorable Forest Management Plan. If we can anticipate this dynamic now, the federal negotiators can see it also.

- We're also concerned about what happens when it is time to take the HCP through NEPA. A "wide range of alternatives" including a "no-action" alternative will be explored.

  - The No-action alternative would question what would happen in absence of the proposed action. What would be suggested for the no-action alternative – a departure?

Preparing alternative Forest Management Plans concurrently with the HCP might avoid this showdown. Alternative FMPs would show the federal negotiators what would happen if they fail to negotiate an acceptable HCP. And, the alternatives will allow ODF to finalize a Forest Management Plan in a timely manner, if the HCP effort fails.

There are other approaches to maintaining the economic value of the State Forest Trust Lands that would form an analytical basis of alternatives to be developed. They are:

1. A departure from even-flow that would accelerate harvest of older stands.

2. Returning to the Counties a portion of the State Forest Trust Lands in an effort to capture their economic value.

   - We offer this alternative because we believe that implementing an even-flow forest plan under take avoidance is not a viable alternative as it will not maintain the value of the asset.

We are pleased to learn that Phase 1 of the HCP analysis will include an independent economic analysis of revenues and costs. This analysis should compare the revenues and costs of:

- A State Forest Management Plan with an HCP.

- A State Forest Management plan with a departure from even-flow that minimizes the acres that grow into habitat attractive T&E species utilizing take avoidance so long as the economic value of the asset is protected.

Tim Josi – FTLAC Chair

John Sweet – FTLAC vice Chair