



Chair Imeson, State Forester Daugherty, and members of the Board, for the record my name is Seth Barnes, and I am a Forester with the Oregon Forest & Industries Council.

I have a few questions I'd like to pose to you and propose that you ask yourself these questions.

Question 1- Why are we using the current Forest Management Plan as the metric for comparison in this analysis?

When it was originally contrived, it was never discussed as setting aside 50% of the landbase. I would suggest that had it been known that it would result in 50% of the forestland being offline, it would have been resoundingly rejected by stakeholders and the Board of Forestry. In fact, to my knowledge, this Board has never agreed to set aside 50% of these forests. This is what happens when the true impacts of iterative decisions are not clearly understood. I would remind this board that in 2004 a ballot measure was put to the voters in this state, measure 34, proposing to set aside 50% of the Clatsop and Tillamook State Forests for conservation purposes. That measure did not only not pass, it in fact failed resoundingly- with 70.9% voting No. Why is this scenario somehow now being used as the baseline from which to measure the efficacy of an HCP effort? This is NOT an appropriate baseline to measure success!

Question 2- How will the agency address Swiss Needle Cast and dying Alder in the context of this plan, and in real time as you consider a new FMP/HCP?

This is a problem NOW, in fact it's been a problem for several years. Its largely a result of early reforestation methods that used poorly suited seed stalk, as well as early vegetation management methods. It's a real problem impacting the growing capabilities and habitat availability in these forests, yet I see no steps to address it, and now we appear poised to wait for another 3 years until action is taken. Furthermore, it appears, based on what I was able to review, that this analysis ignored this major issue. I would ask, what is the plan?

Question 3- How does the 3-year planning horizon for this HCP match up with the 1-year planning horizon for creating a new FMP?

This 'parallel process' seems fraught with problems. I am not aware of any other planning process that has taken a similar route. It still remains unclear to me how the agency or the Board intends to match up these processes which are both being conducted simultaneously on two different time horizons.

And finally- Should the HCP path be taken; how can we ensure long-term viability of the plan in providing 'operational certainty'?

A fundamental value of an HCP to any landowner is 'operational certainty' over a long period of time. Working to ensure that the plan is set up to deliver that durability then should be a primary focus. The degree to which ODF and this board leave holes or openings that undermine that certainty will impact the REAL value of whatever is negotiated.

In closing, these are important questions to ask. An HCP is an attractive tool for managing forests in proximity to listed species or candidate species. The question of whether it makes business sense

requires that we realistically project likely costs in terms of habitat provisions, and then compare those to appropriate alternative management scenarios. It also requires a careful and thoughtful negotiation process, where clear alternatives are understood.

Thank you for the opportunity to provide comments,

Seth Barnes
Director of Forest Policy