

# Board of Forestry

## Testimony of Dave Ivanoff, representing Hampton Lumber -- April 24, 2019

I am Dave Ivanoff, representing Hampton Lumber, which employs over 700 employees at its Oregon operations in Willamina, Tillamook, Warrenton, Banks and Portland.

At the FTLAC meeting on April 12, 2019, senior ODF staff presented a timeline of work planned for the HCP process. We have deep concern around the HCP's development in general, and specifically around the conservation strategies that will be finalized this summer and publically reviewed in an "Effects Analysis" later this fall.

Specific concerns around ODF intent in negotiating an HCP include the following:

- (1) From what base-line will conservation strategies be developed? With what degree of intensity and strength will ODF conduct negotiations on behalf of Oregon's citizens? Our view is that it is critically important in conducting negotiations with the federal services that ODF emphasize its capacity to manage the land as any other non-federal landowner under the regulatory framework of the Forest Practices Act (FPA) and using a Take Avoidance strategy to comply with federal ESA issues. For measuring the opportunity cost of an HCP, it is essential to use the capacity of the FPA framework to not necessarily manage to, but certainly to measure against, the economic, social and conservation implications of any hypothetical HCP policy decision.
- (2) The lack of transparency in the conservation strategies that will be developed by August of this year is of grave concern to us. These strategies will ultimately underpin the HCP and therefore have huge potential to irreparably compromise the ability of ODF to manage the land pursuant to the trust mandate intended at the time of transfer from the counties to the state. We have no idea what is likely to be included in these strategies. Notwithstanding the intended "Effects Analysis" process, our belief is that once these conservation strategies are rolled out this fall, there will be minimal opportunity for needed change through any sort of public process.
- (3) From our perspective, members of the HCP Scoping Team do not include technical experts in the areas of forest economics, silviculture and social science to provide opportunity cost context around the implications of potential negotiated policy decisions. Based on past HCP efforts, experts in these areas are clearly needed to help ODF negotiators operate from a position of strength and help them recognize when the need for an exit strategy is required in the inevitable likelihood of intransigent positions that will be taken by the federal services.

In summary, a poorly negotiated HCP has the potential to have devastating impacts on the economic and social fabric of many small Oregon communities. From the FTLAC meeting and the ODF public roundtable discussion which followed, we are concerned the trajectory of this process is to secure an HCP no matter the cost.

At the April 12, 2019 FTLAC meeting, Commissioner John Sweet provided gripping testimony on the problem with inadequate local timber supply which has resulted in the announced closure of the Georgia Pacific sawmill in Coos County. Commissioner Sweet's gut-wrenching comments about the effects of this closure and the perpetuation of the social problems in Coos County that are symptomatic with poverty were incredibly difficult to absorb. The current Coos County problems with drug and alcohol abuse, domestic violence,

childhood trauma, crime and other social fabric issues will intensify with this closure. In his final remarks, Commissioner Sweet, with great emotion, admonished his fellow commissioners "... to not allow this to happen in your communities."

As we have repeatedly testified, public timber supply is critically important in order for not only the Hampton family, but also for the remaining family-owned forest sector businesses in western Oregon to continue to provide living wage jobs to their employees and support for local communities. An HCP must be based on proven science. When faced with competing scientific opinions in the HCP process, ODF must not needlessly capitulate to NMFS or USF&WS personnel with potential agendas or belief systems where species are valued over people. We respectfully request you acknowledge the very real risk of replication of the Coos County socioeconomic impacts resulting from reductions in public timber harvest and charge ODF with the mission of transparently negotiating from a position of strength on behalf of Oregon's small communities and their citizens.

Thank you for the opportunity to comment.