

Submitted: 07/23/2019

Oregon Board of Forestry: Members and friends of Audubon Society of Lincoln City ask that you act to accept the Petition for Rulemaking to Identify and Develop Protection Requirements for Coho Salmon Resource Sites currently before the Oregon Board of Forestry and direct Department staff to immediately begin actions to meet the legal responsibilities to designate resource sites for threatened and endangered species on state and private forestlands. Additionally, we ask that you critically examine Department staff objections to “species-by-species” conservation efforts as a specious effort to avoid their legal responsibilities. As an organization we would be thrilled to see the Department engaged in “ecosystem approaches” to conservation but that has simply NEVER been the case. Rules for habitat protection, and ecosystem services under the current Oregon Forest Practices Act are the weakest in our region if not the nation. Enforcement of even these rules is almost nonexistent. Rule waivers, exemptions, and special allowances are the norm and as a result our wildlife, landscapes, and citizens suffer real harm. While we are a “bird” organization we have an all-encompassing vision that drives our conservation efforts: connected, protected habitat that stretches from the peaks of the Coast Range to the farthest reaches of the Territorial Sea. We also actively practice cooperation and so seek common ground with all our “fish people” colleagues. We ask that you do what is right. Accept the petition and immediately engage ODF in substantive, meaningful, and ultimately effective rules to designate and protect resource sites.

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