



September 6, 2022

To: Board of Forestry
From: Dave Wells, State Chair
Oregon Society of American Foresters

Subject: Agenda Item #1 – General Public Comments; State Lands Habitat Conservation Plan

Good morning Chair Kelly, State Forester Mukumoto and members of the Board,

The Oregon Society of American Foresters (OSAF) is the Oregon division of the National Society of American Foresters. OSAF consists of over 700 members, working for public agencies, private industry, higher education and consultants, and also includes student members and retirees. The Society of American Foresters (SAF) is the national scientific and educational organization representing the forestry profession in the US. National SAF supports the management of forests for biological diversity as discussed in our National Position Statements entitled “[Biological Diversity in Forest Ecosystems](#)” and “[Protecting Endangered Species Habitat on Private Land](#)” (which can also be applied to state lands).

OSAF thanks the Board of Forestry for your leadership on state lands issues and your consideration of environmental, social and economic benefits received by all Oregonians through their active management. Our comments on Oregon Department of Forestry’s Habitat Conservation Plan (HCP) largely address what is currently identified as the Preferred Alternative as submitted by the Department as the applicant within the Federal Services’ Draft Environmental Impact Statement. Specifically we discuss our professional views on appropriate forest management and silviculture from a scientific perspective while identifying issues of overly restrictive prescriptions and management actions as described in the currently proposed HCP.

Active Forest Management

One of the fundamental tenets of our organization is that it is beneficial and appropriate to actively practice science-based forest management in order to meet environmental, social and economic goals for our forests. This is outlined in our Position Statement entitled “[Active Management to Achieve and Maintain Healthy Forests](#)”. There are increasing threats to the health of our forests including climate change, invasive pests, and wildfire. We know that active, adaptive management is the best way to address these threats.

Forest Resiliency and Mitigation of Threats

Oregon’s forests are threatened by catastrophic wildfires, insects and disease (accentuated by climate change) and there is a pressing need for active forest management to mitigate those threats. As we all observed during the 2020 Oregon Labor Day fires, there are no distinguishable boundaries (segments) during a raging and catastrophic wildfire regardless of land ownership, riparian versus upland habitat, land allocation, current forest management plan or designation, etc. Raging and catastrophic wildfires like we have experienced over the past several years go where and when they want irrespective of what is in front of them.



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The question thus arises whether this HCP is reasonable given that ODF is already strategically addressing catastrophic wildfires risk at both the site specific as well as the landscape scale. OSAF believes that this expansive designation of HCAs and Riparian Conservation Areas (RCA) will complicate active management to reduce threats to forests, and likely lead to substantially fewer actions to mitigate those threats.

Additionally, we are concerned about the limited scope of Swiss needle cast treatment areas and use of hardwood conversion to deal with mismanaged alder. Douglas-fir forests near the Oregon Coast have experienced an unprecedented outbreak of Swiss needle cast, resulting in growth losses of up to 50% that must be fully addressed. The so called “zombie alder” must also be thoroughly dealt with in order to restore habitat and healthy forest ecosystems in these stands’ place.

Professional foresters, in collaboration with other natural resource specialists, need the flexibility to prescribe and use a broad range of proven, science-based methods for preventing and treating forest health problems. When tailored to each unique, local situation, such flexibility allows highly effective, economical and environmentally sound practices to be implemented. Active management can help ensure that Oregon’s healthy forests will be maintained and those that are currently unhealthy will be substantially improved.

Wildlife Habitat and Adaptive Management

We are concerned the Habitat Conservation Areas (HCA), as outlined in the Habitat Conservation Plan (HCP), are overly restrictive and that these areas will not fully benefit from the best and most current science and management practices. We also know that active management will accelerate the attainment of the desired future forest conditions which are needed for the recovery of designated special status species.

For example, a May 2022 publication by Tappeiner, et al. demonstrates how multi-entry thinning regimes in the Coast Range of Oregon can accelerate restoration of older forest characteristic such as tree diameter, even in mature stands. In riparian areas, stand management can be applied to not only accelerate growth, but also to improve species composition and structure.

One of the fundamental purposes of active forest management is to provide habitat for wildlife across the landscape. Because there is such a diversity of species that call Oregon home, it follows that we need a broad range of habitat types from young forests to old and everything in between. That means that land managers must focus their management to provide all ages classes of forest. Conserving older forests has the dual effect of supplanting young forest habitat as the trees grow older and potentially losing older forests to fire. We encourage a close look at the monitoring and adaptive management plan for the covered species. Measuring habitat for the covered species is important, but does not tell the entire story. Adaptive management is needed to determine if the covered species in the HCP are reacting to the management prescriptions.



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Riparian Conservation Areas

In our position statement entitled, "[Managing Riparian Forests](#)," we point out the necessity to manage riparian forests. OSAF believes that active management of riparian areas on public and private forestlands should be a key part of contemporary strategies and policies to maintain and improve water resources along with fish and wildlife habitat. Highly cautious decisions have contributed to very limited management and inconsistent results in many riparian forests in Oregon, even where some active management is allowed. We are concerned that, lacking management, many of these unique and ever-changing forests now have or will develop conditions that are less than ideal for habitat and water quality, including reduced biodiversity and substantially increased risks of damaging wildfires.

The forest health benefits that ODF and the Board expect to attain through upland thinning treatments in the HCP outside of HCAs and RCAs can also be achieved in RCAs with similar active management prescriptions and we urge the Department to critically consider the silvicultural effects of having such expansive RCAs that are restrictive in management availability.

It has been well documented that thinning in dense, uniform forest stands accelerates the stand's trajectory to produce large conifer trees, vertical diversity, and tree-species diversity (Garman, Steven L.; Cissel, John H.; Mayo, James H. 2003.); all characteristics that we assume are desirable in RCAs as much as they are desirable in the uplands.

The tradeoffs that ODF are likely be considering through the refinement and finalization of the HCP will be between achieving these forest health benefits and potentially having adverse impacts to streams. These impacts to streams typically include stream temperature, wood recruitment, and sedimentation associated with active management.

We would like ODF and the Board to consider that research suggests that the amount of canopy cover retained in the riparian buffer is not a strong explanatory variable to stream temperature and that very small headwater streams may be fundamentally different than many larger streams because factors other than shade from the overstory tree canopy can have sufficient influence on stream temperature (Janisch, et al. 2012). To further explain this point, Anderson and Larson in their 2007 paper titled, "*Riparian Buffer and Density Management Influences on Microclimate of Young Headwater Forests of Western Oregon*" found that with no-harvest buffers of 15 meters (49 feet), maximum air temperature above stream centers was less than one-degree Celsius greater than for un-thinned stands meaning that some management of riparian areas has little to no effect on temperature.

Wood recruitment, as pursued with biological objective 1.1, can also be higher in riparian reaches with management. Wood volume in early stages of decay was higher in stream reaches with a narrow 6-meter buffer than in stream reaches with larger 15- and 70-meter buffers and in un-thinned reference units according to a 2016 study by Burton, Olson and Puettmann. The HCP states, ". Field research and modeling demonstrate that approximately 95% of the total instream wood inputs from adjacent riparian areas to fish-bearing streams come from distances of 82 to 148 feet (slope distance) from the edge of the stream channel." Yet, in the 2016 study by Burton, Olson and Puettmann, it was found that 82% of



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sourced wood in early stages of decay originated from within 15 meters of streams. To add to this research, it has been found that 10-meter no-cut buffers maintained 93% of the in-stream wood in comparison to no treatment according to a 2015 paper by Benda, Litschert, Reeves and Pabst.

Collectively, we believe that this literature suggests that there exists a declining rate of returns for “protective” measures, such as no-cut buffers, beyond 30-40 feet. Resource values such as thermal regulation and coarse wood recruitment begin to diminish in scale as no-cut buffers become much larger. We believe that the benefits in forest health achieved through density management will greatly outweigh the potential minor tradeoffs in stream temperature and wood recruitment, based on this scientific literature.

We urge ODF and the Board to reconsider its quantity of RCAs and the management prohibition within them.

Carbon and Climate Change

OSAF supports science-based policy efforts to recognize the role that Oregon’s forests and forest management play in mitigating greenhouse gas emissions through the sequestration of carbon in forests and wood products, the substitutions of biomass-derived products for fossil fuels, and avoided emissions associated with management practices that increase forest resistance and resilience to wildfire, droughts, insects, and other disturbances.

OSAF would support the addition of language to the HCP that explicitly recognizes the contributions of carbon stored in harvested wood products, emissions avoided by the substitution of harvested wood products for higher greenhouse gas producing materials, and the effects of market leakage associated with changes in timber harvest levels and is worked into the analysis of the environmental and social impacts of the Alternatives. Carbon stored in harvested wood products has the potential to offset a significant amount of carbon emissions from industrial processes in timber producing areas (Johnston and Radeloff 2019), and life cycle analyses indicate that the substitution of wood products for building materials such as steel, concrete, brick, and vinyl promotes increased carbon storage and reduce greenhouse gas emissions (Lippke et al. 2004, Malmshemer et al. 2011). Additionally, the failure to account for market leakage in carbon inventories can result in dramatic overestimates of carbon sequestration associated with forest carbon projects that reduce harvest levels (Murray et al. 2004).

We suggest not simply using inventories and methods such as, the United States Environmental Protection Agency’s Inventory of U.S. Greenhouse Gas Emissions and Sinks for developing inventories and analysis because they do not explicitly account for changes in carbon storage within the harvested wood products pool over time, for avoided emissions as a result of wood product substitution for higher greenhouse gas emitting materials, or for the impacts of market leakage associated with any reductions in Oregon’s timber harvest levels.



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OSAF would support additional text in the HCP to specify that these important contributions to net carbon sequestration in Oregon's forestlands are being incorporated into decision making related to management practices on Board of Forestry Lands.

Furthermore, OSAF supports the addition of new or expanded language that calls for estimates of avoided emissions associated with forest management practices that reduce forests' vulnerabilities to wildfire, insects, and drought to be included in the HCP and Federal Services' analysis. We would like to see these documents explicitly acknowledge the importance of practices that increase the resistance of forest carbon stocks to disturbance (i.e, practices that reduce losses in forest carbon).

Post-Disturbance Recovery and Salvage

We are also concerned about the salvage logging provisions of the HCP. For all intents and purposes, the HCP prohibits salvage logging after catastrophic events. As outlined in our Position Statement entitled "*Salvage Harvesting on Public Forestland in Oregon*" and in our "[Important Forestry Issues in Oregon](#)" policy booklet, OSAF supports salvage in appropriate areas after wildfire, drought and insect caused mortality, and other major disturbances, a view that is consistent with a survey of Oregonians.

Appropriate areas would include those subjected to high severity fires such as the 2020 Labor Day Fires. Those severely burned forests contribute little to suitable habitat for threatened and endangered species. Additionally, they are now considerable net carbon emitters, and become areas resistant to future fire control and dangerous for fire fighters. Salvaging of dead material reduces the build-up of heavy fuels in planted or naturally regenerated forests following disturbance and the carbon is locked in forest products rather than being emitted over time through decay. Salvaging can be done in a way that provides for social, economic, and environmental benefits. In conclusion, OSAF believes that the "one and done" or "hands-off" strategy for management of the HCA is an inferior approach as compared with an active adaptive management approach. We also believe salvage logging in severely burned forests is appropriate.

Conclusion

OSAF believes a healthy forest is a resilient forest. Science-based active management enhances forest ecosystem resilience, ecosystem services and produces forest products to create a high-quality of life for all Oregonians. We support active forest management prescribed by professional foresters to achieve and maintain healthy public and private forests, consistent with land management objectives.

We would like to see additional consideration in the HCP for:

- Creation of diverse habitat types throughout the planning area;
- A wholistic effort to address Swiss needle cast and "zombie alder";
- A more well-rounded adaptive management plan that addressed changes in management availability if species are recovering;
- Management in RCAs based on the best available science, resiliency goals and the achievement of desired future conditions;



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- The climate and carbon benefits of active management and harvested wood through avoided emissions and a wholistic lifecycle of forest carbon; and
- Inclusion of science-based post-disturbance recovery actions and salvage within RCAs and HCAs.

Thank you for providing this opportunity to testify today.

Sincerely,

Dave Wells, State Chair
Oregon Society of American Foresters



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Selected References

- Abatzoglou, J.T. and A.P. Williams. 2016. Impact of anthropogenic climate change on wildfire across western US forests. PNAS 113 (42) 11770-11775. <https://doi.org/10.1073/pnas.1607171113>
- Adams, P.W. 2007. Policy and management for headwater streams in the PNW: Synthesis and reflection. Forest Science 53(2):104-118.
- Anderson P.D., Larson D.J., Chan, S.S. 2007 Riparian Buffer and Density Management Influences on Microclimate of Young Headwater Forests of Western Oregon. Forest Science, 53(2):254-269.
- Arismendi, I. and others. 2017. Suspended sediment and turbidity after road construction/improvement and forest harvest in streams of the Trask River Watershed Study, Oregon. Water Resour. Res., 53, 6763–6783, doi:10.1002/2016WR020198.
- Bateman, D.S. and others. 2016. Effects of stream-adjacent logging in fishless headwaters on downstream cutthroat trout. Can. J. Aquat. Sci. 73:1-16.
- Bateman, D.S. and others. 2018. Fish response to contemporary timber harvest practices in a secondgrowth forest from the central Coast Range of Oregon. For. Ecol. Mgmt. 411:142-157.
- Benda, L.D. Litschert, S.E., Reeves, G. and R. Pabst. 2015. Thinning and in-stream wood recruitment in riparian second growth forests in coastal Oregon and the use of buffers and tree tipping as mitigation. Journal of Forestry Research.
- Bonnicksen, T.M. 2008. Greenhouse gas emissions from four California wildfires: Opportunities to prevent and reverse environmental and climate impacts. FCEM Report 2. The Forest Foundation, Auburn, CA.
- Bladon, K.D. and others. 2016. A catchment-scale assessment of stream temperature response to contemporary forest harvesting in the Oregon Coast Range. For. Ecol. Mgmt. 379:153-164.
- Brown, Dan. Oregon Water Quality Index Data Summary Water Years 2009-2018. Oregon DEQ, 2019. Available at: <https://www.oregon.gov/deq/FilterDocs/WQI2018DataSummary.pdf>
- Buhl, C. and others. 2017. Forest health highlights in Oregon – 2016. Oregon Dept. Forestry and USDA Forest Service. 36 p. Available at: https://www.fs.fed.us/foresthealth/docs/fhh/OR_FHH_2016.pdf
- Burton, Julia I., Olson, Deanna H., and Puettmann, Klaus J. 2016. Effects of riparian buffer width on wood loading in headwater streams after repeated forest thinning. Forest Ecology and Management. 372 (2016) 247-257.
- Bywater-Reyes, S. and others. 2017. Geology and geomorphology control suspended sediment yield and modulate increases following timber harvest in temperate headwater streams. J. Hydrol. 548:754-769.
- Cloughesy, M. and J. Woodward. 2018. Oregon's Forest Protection Laws – An Illustrated Manual, 3rd Edition. Available from the Oregon Forest Resources Institute, 317 SW Sixth Ave., Suite 400, Portland OR 97204, and <https://oregonforests.org/publications>.
- Dwire, K.A. and others. 2016. Riparian fuel treatments in the western USA: Challenges and considerations. Gen. Tech. Rep. RMRS-GTR-352. Fort Collins, CO: USDA For. Serv., Rocky Mtn. Res. Sta. 156 p.
- Edmonds, R.L., J.K. Agee and R.I. Gara. 2000. Forest health and protection. 1 st Ed., McGraw-Hill Co., San Francisco, CA. 630p.
- Filip, G.M., C. Schmitt, D. Scott, and S. Fitzgerald. 2007. Understanding and defining mortality in western conifer forests. Western Journal of Applied Forestry 22(2):105-115.
- Finkral, A.J., and Evans, A.M. 2008 The effects of a thinning treatment on carbon stocks in a northern Arizona ponderosa pine forest. For. Ecol. Manage. 255(7):2743-2750.
- Hawksworth, J., Clements, P., and Laine, J. 2017. Forest Practices Compliance Audit: 2017 Annual Report. Oregon Department of Forestry. Available at:



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https://www.oregon.gov/odf/board/bofarchives/20180905/BOFATTCH_20180905_03_02_Forest%20Practices%20Compliance%20Audit%202017%20Annual%20Report.pdf

- Hicke, J.A., Allen, C.D., Desai, A., Dietze, M., Hall, R.J., Hogg, E.T., Kashian, D. Moore, D., Raffa, K., Sturrock, R., and Vogelmann, J. 2012. The effects of biotic disturbances on carbon budgets of North American forests. *Global Change Biol.* 18:7-34.
- Hobbs, S.D., and others, eds. 2002. *Forest and stream management in the Oregon Coast Range*, Oregon St. Univ. Press.
- Ice, G.G., and others. 2004. Use of natural temperature patterns to identify achievable stream temperature criteria for forest streams. *Western Jour. Applied Forestry* 19(4):252-259.
- Ice, G.G., and others. 2004. Forest management to meet water quality & fisheries objectives: Watershed studies and assessment tools in the PNW. In: *A century of forest and wildland watershed lessons*. Soc. Am. Foresters, Bethesda MD.
- Institute for Natural Resources. 2020. *Trees to tap: Forest management and community drinking water supplies*. Available from the Oregon Forest Resources Institute, 317 SW Sixth Ave., Suite 400, Portland OR 97204, and <https://oregonforests.org/publications>.
- Janisch, Jack E, Wondzell, Steven M., Ehinger, William J. 2012. Headwater stream temperature: Interpreting response after logging, with and without riparian buffers, Washington, USA. *Forest Ecology and Management*, 270, 302-313.
- Johnston, C.M.T., and Radeloff, V.C. 2019. Global mitigation potential of carbon stored in harvested wood products. *Proc. Natl. Acad. Sci.* 116(29):14526-14531.
- Jolly, M.W. and others. 2015. Climate-induced variations in global wildfire danger from 1979-2013. *Nature Communications*. 6:7537 doi: 10.1038/ncomms8537.
- Lippke, B., J. Wilson, J. Perez-Garcia, J. Bowyer, and Meil, J. 2004. CORRIM: Life-cycle environmental performance of renewable building materials. *For. Prod. J.* 54(6):8-19.
- Louch, J. and others. 2017. Potential risks to freshwater aquatic organisms following a silvicultural application of herbicides in Oregon's Coast Range. *Integr. Environ. Assess. Mgmt.* 13(2):396-409.
- Malmsheimer, R.W., Bowyer, J.L., Fried, J.S., Gee, E., Izlar, R.L., Miner, R.A., Munn, I.A., Oneil, E., and Stewart, W.C. 2011. Managing forests because carbon matters: Integrating energy, products, and land management policy. *J. For.* 109(7):7-50.
- Murray, B.C., McCarl, B.A., and Lee, H-C. 2004. Estimating leakage from forest carbon sequestration programs. *Land Econ.* 80(1): 109-124.
- Ontl, T.A., Janowiak, M.K., Swanston, C.W., Daley, J., Handler, S., Cornett, M., Hagenbuch, S., Handrick, C., McCarthy, L., and Patch, N. 2020. Forest management for carbon sequestration and climate adaptation. *J. For.* 118(1): 86-101
- Oregon Forest Resources Institute. 2016. *Forest Threats*. Available from: Oregon Forest Resources Institute, 317 SW Sixth Ave., Suite 400, Portland OR 97204, and <https://oregonforests.org/publications>
- Oregon Forest Resources Institute. 2017. *Impacts of Oregon's 2017 Wildfire Season – Time for a crucial conversation*. Available from: Oregon Forest Resources Institute, 317 SW Sixth Ave., Suite 400, Portland OR 97204, and <https://oregonforests.org/publications>
- Oregon SAF. 2018. *Position statements*. Oregon Society of American Foresters. Available at: <http://www.oregon.forestry.org/oregon/policy/general>
- Penaluna, B. and others. 2015. Local variability mediates vulnerability of trout populations to land use and climate change. *PLoS ONE* 10(8):e0135334. doi:10.1371/journal.pone.0135334
- Pettit, N.E. and R.J. Naiman. 2007. Fire in the riparian zone: characteristics and ecological consequences. *Ecosystems* 10:673-687.



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- SAF. 2014. Forest management and climate change. A position statement of SAF. Society of American Foresters. Bethesda, MD. Available at: https://www.eforester.org/Main/Issues_and_Advocacy/Statements/Forest_Management_and_Climate_Change.aspx
- SAF. 2017. Nonnative invasive forest species. A position statement of the SAF. Society of American Foresters. Bethesda, MD. Available at: https://www.eforester.org/Main/Issues_and_Advocacy/Statements/Nonnative_Invasive_Forest_Species.aspx
- Seidl, R., Thom, D., Kautz, M., Martin-Benito, D., Peltoniemi, M., Vacchiano, G., Wild, J., Ascoli, D., Petr, M., Honkaniemi, J., Lexer, M.J., Trotsiuk, V., Mairota, P., Svoboda, M., Fabrika, M., Nagel, T.A., and Reyer, C.P.O. 2017. Forest disturbances under climate change. *Nat. Clim. Change*. 7: 395-402.
- Shaw, D, P. Oester and G. Filip. 2009. Managing insects and diseases of Oregon conifers. EM 8980. Oregon State Univ. Extension Service, Corvallis. 98p. Available at: <https://catalog.extension.oregonstate.edu/sites/catalog/files/project/pdf/em8980.pdf>
- Shaw, D. 2008. Swiss needle cast of Douglas-fir in Oregon. EC 1615. Oregon State Univ. Extension Service, Corvallis. 4p. Available at: <https://catalog.extension.oregonstate.edu/ec1615>
- Shaw, D. 2007. Sudden oak death. EC 1607. Oregon State Univ. Extension Service, Corvallis. 2p. Available at: <https://catalog.extension.oregonstate.edu/ec1607>
- Tappeiner, J.C., D.Adams, C. Montgomery and D. Maguire 2022. Growth of Managed Older Douglas Fir Stands: Implications of the Black Rock Thinning Trial in the Coast Range of Western Oregon. *Journal of Forestry*. Vol 120, No.3
- Watts, A. 2016. The idiosyncrasies of streams: Local variability mitigates vulnerability of trout to changing conditions. *Sci. Findings* 191, USDA For. Serv., PNW Res. Sta. <http://www.fs.fed.us/pnw/publications/scifi.shtml>
- Westerling A.L. 2006. Warming and earlier spring increase western U.S. forests to wildfire activity. *Science* 313 5789:940-943.
- Williams, C.A., Gu, H., MacLean, R., Masek, J.G., and Collatz, G.J. 2016. Disturbance and the carbon balance of US forests: a quantitative review of impacts from harvests, fires, insects, and droughts. *Glob. Planet. Change*. 143: 66-80.

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DARRIN L. LANE
Administrative Officer

August 30, 2022

Jim Kelly, Chair of Board of Forestry
Oregon Department of Forestry
2600 State Street
Salem, OR 97310

Cal Mukumoto, State Forester
63612 Fifth Rd
Coos Bay, OR 97420

Dear Mr. Kelly and Mr. Mukumoto:

We write, again, to express our concerns about the proposed HCP. You have heard from Linn County regarding our concerns about best science not being considered (i.e. Trask Paired River Study, Spotted/Barred Owl management and others). You have heard a lot from Linn County about the social and economic issues from reduced revenue, loss of jobs and the loss of capacity as a direct result of the HCP very negatively affecting our communities and citizens. We have talked about the results that the massive wildfires have had and will have going into the future as large swaths of the forests are destroyed. We have reminded ODF and the Board of lost lives and the risk to our constituents.

It is our concerns regarding wildfires that causes us to write about the relationship of the HCP to Governor Brown's "Governor's Council Wildfire Response" released in 2019. As we reread that proposed response to wildfire, **more land** - not less, is to be treated annually per the plan. The plan talks of treating 300,000 acres annually; this is not all on State lands but also on Federal lands. How does the HCP address this increased need for treatment on state lands? It looks to us that the need for more treatment is not considered and it is important that the work described in the plan be integrated into the HCP. The proposed HCP does not treat more acres; it does the opposite by increasing acres not treated. Yet, treatment of forestlands was ranked "highest" priority in the Governor's plan.

The Governor's Council talks that the pace of treatments needs to increase 3 to 4 times what is happening now. How is the need to increase treatment rates addressed in the HCP for state lands? Do we have to wait for a new Forest Management Plan to be done after the approval of the HCP? It will be too late once the HCP is set as the HCP cannot be changed for 70 years which pushes preventative fire response into the distant future.

Please stop the current HCP. Do not let a "plan schedule" drive the decision. Please do not push out the current HCP. We do not support it!

Sincerely,



Roger Nyquist, Chair



William C. Tucker, Vice-Chair



Sherrie Sprenger, Commissioner

c: David Yamamoto, Tillamook County Commissioner



August 30, 2022

VIA EMAIL (boardofforestry@oregon.gov)

Oregon Board of Forestry
Oregon Department of Forestry
Board Support Office
2600 State Street
Salem, OR 97310

Re: Comments on the Habitat Conservation Plan

Chair Kelly and Members of the Oregon Board of Forestry:

I am writing today to share my thoughts regarding the creation of a Habitat Conservation Plan (HCP) for the Western Oregon State Forest. There has been tremendous effort put into the draft plan proposed. However, as I sit on the Council of Forest Trust Land Counties (CFTLC), I cannot ignore the concerns raised by my fellow trust land counties that will be far more impacted than Washington County, should the draft HCP be approved.

The concept of Greatest Permanent Value (GPV), as supported by the Oregon Department (ODF) and Board of Forestry (BoF), ensures and values in equal measure all the benefits of forest resources, including sustainable timber harvest. I support this policy and if we are still abiding by the GPV in the formation of the HCP, find it hard to understand how the current draft lives up to the tenant of sustainable harvest while proposing to restrict access to so many acres of forest from that very activity. This impact to counties like Clatsop, most notably, is a significant depletion to the county budget and strain to ensure basic services to reliant community members. There are very real financial consequences at stake here.

Problematic still, is the lack of transparency from ODF and willingness to co-create with its county partners. On more than one occasion I have heard frustration expressed during a CFTLC meeting over the lack of involvement granted the counties in developing the HCP. It has been suggested that partnering early on, before a draft had been finalized, could have helped mitigate the opposition we now see at the end of the process. Instead, the counties were forced to develop their own version of a draft HCP that addresses the very real threat of the barred owl on the northern spotted owl population, and submit separately, only to then be dismissed by the federal agencies for consideration.

Board of County Commissioners

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Further, several times I have witnessed the counties request the data and modeling that form the basis for the conclusions made by ODF, only for it to never materialize. This lack of information sharing leading to more irritation and inability among the counties to understand how we got here. At the very least, there should be a common understanding of the baseline data we are working with that informs the different actions we could take. Without this baseline agreement, there can be no trust in the conclusions of the draft Environmental Impact statement or draft HCP.

There are benefits to an HCP. Protection against lawsuits cannot be overstated. However, it needs to be done right and with buy-in from the partners of ODF. That is not the case currently. As difficult and cumbersome as it might be, the most logical course of action right now is to start over with the HCP and in this second attempt, partner with the Counties of Forest Trust Lands to ensure all parties are brought on the journey.

Thank you for taking the time to consider my concerns. Should you have any questions, please do not hesitate to contact me.

Sincerely,

Jerry Willey
Washington County Commissioner, District 4