



Board of Forestry Public Meeting

Public Forum

The Board of Forestry received 23 submissions for written testimony under Public Forum.

This is an information item.

Good morning,

My name is Anna Kaufman.

I am the Astoria Coordinator for North Coast Communities for Watershed Protection.

In June, I shared concerns about proposed ODF clearcuts in Clatsop County, including “Mothball Hill” and “Davis Ridge.” Since then, “Mothball Hill” was listed as an “alternate” sale for 2025, while “Davis Ridge” will continue forward as a “primary.”

Though I’m sorry for the upset it caused, I feel it was important when Board member Bob Van Dyk accepted our invitation to visit the sites and meet with residents living next to them. He was clear that he had no jurisdiction over ODF’s timber sales. Thank you to Mr. Van Dyk and to the three Astoria District ODF employees who also attended. This was a huge step to increase communication between citizens and ODF.

Still, policies regarding ODF’s efforts to include the public in its annual processes need to be improved. Residents impacted by ODF’s practices felt a lack of transparency. This could be addressed by expanding the 45 day Annual Operation Plan comment period, notifying county residents, especially those next door to operations, of the draft plan and how to comment well ahead of time, and creating more localized citizen advisory groups to provide input on State Forest management.

We have a petition to halt the clearcutting of “Davis Ridge” and “Mothball Hill”, as well as to ask for better communication and public engagement from ODF. Since starting the petition mid-June, we’ve collected over 2600 signatures, all people who love the North Coast because of its state forests, and would like them to remain intact.

I urge the Board to consider this petition, as well as alternatives to clearcutting our forests, and to implement policies to increase public awareness of and participation in forest management processes.

Thank you,

Anna Kaufman



NORTH COAST COMMUNITIES for WATERSHED PROTECTION

Dear Chair Kelly, State Forester Mukumoto, and Members of the Board of Forestry,

We, the undersigned, are residents, business owners, and visitors of the North Oregon Coast who are concerned about their homes, access to clean drinking water, work, and recreation within Clatsop County. The proposed 'Mothball Hill' clearcut lies adjacent to John Day County Park and the Columbia River. The proposed 'Davis Ridge' clearcut lies adjacent to Gnat Creek. The proposed 'Slough Hill' clearcut lies near Blind Slough, a tributary to the Columbia River.

PETITION

WHEREAS, the proposed clearcuts named 'Mothball Hill', 'Davis Ridge', and 'Slough Hill' (Alt) in Oregon Department of Forestry Astoria District draft Annual Operations Plan for 2025 are immediately abutting numerous residential properties and recreational areas, and fail to address community concerns;

WHEREAS, Oregon Department of Forestry's planned logging fails to address unprecedented climate change and does not account for the increasing coastal heat waves and water scarcity correlated with deforestation;

WHEREAS, the standard practice of pesticide applications after logging can have serious impacts on the health of neighboring residents, recreationalists, drinking water quality, and wildlife;

WHEREAS, clearcutting and replanting practices are known to increase wildfire intensity and reduce stream flow for up to fifty years post harvest; they are known to increase risk of landslides on steep slopes, as found at 'Mothball Hill' and 'Slough Hill,' as well as increase flash floods during storm events;

WHEREAS, the proposed logging near John Day River and Gnat Creek increases the likelihood of silt and other contaminants impacting drinking water, as well as wetlands and tributaries that are essential to salmon and other aquatic life; salmon are a native species that are endangered due to numerous industrial practices including clearcutting;

ACCORDINGLY, Petitioners want 'Mothball Hill', 'Davis Ridge', and 'Slough Hill' removed from ODF's 2025 Astoria District Annual Operations Plan and eliminated from further considerations of timber harvests in the future.

ACCORDINGLY, Petitioners want the ODF to publicize draft Annual Operation Plans in multiple media at least two months in advance of the public comment deadline and to make a special effort to contact and meet with residents living in proximity to any planned logging before initial approval.

PETITIONERS

1. Anna Kaufman	97103	1307. Pamela Breska	12866
2. Denise Monaghan	97103	1308. Adrienne Jasmer	90505
3. Richard Felley	97131	1309. Ayden Barakat	19403
4. Avi Goldshmidt	97103	1310. Yvette Plaisance	70354
5. teresa mcgrath	97212	1311. Christopher Cazzato	60656
6. Enid W. Archer	97103	1312. Stephanie Gonzalez	60666
7. Lucie Bisbee	11238	1313. Janice Ciampaglione	12538
8. Katherine Bishop	93222	1314. Carrie Taylor	98682
9. Joshua Wright	98584	1315. Celeste Burkhart	84087
10. Karen Trumper	97130	1316. Michael Blackwell	03743
11. Jennifer Rideout	97103	1317. Eltona Simmons	10457
12. nancy webster	97136	1318. Rachel Mitchner	15210
13. Angie Dutcher	97030	1319. James Bass	11209
14. Melissa Allen	97103	1320. Siara Hergenrader	68022
15. Antonio Lomeli	95501	1321. Patricia Vineski	13617
16. John Morris	Nehalem, OR	1322. Ellen Sander	95682
17. Andi McArthur Benke	97138	1323. Kennth Dobbs	40051
18. Micah Barron	97103	1324. Mary Tristany	91763
19. Larson Leslie	90802	1325. Andria Quezada	80211
20. susan glarum	97146	1326. Janet christian	45430
21. Terry Henry	98178	1327. Erin Dentinger	17821
			54837-89
22. Ruth Falco	97221	1328. Julie Martin	18
23. Melinda Savitt	92886	1329. Kinsley Thompson	62316
24. Zack Arledge	80521	1330. Rebecca Bermosk	45805
25. Hugh KENNY	90039	1331. Cynthia Allen	30043
26. Charlie Kaufman	10013	1332. luzandra rico	75041
27. Theo Vamvounakis	85715	1333. Evon McRae	2062
28. Katrina Kampmiller	97007	1334. Liam Russell	92712
29. Rebecca Waring	21210	1335. Peyton Johnson	30349
30. Jon Inwood	11226	1336. Jennifer McKeel	84081
31. Kirista Trask	97222	1337. Nyzier Maple	19020
32. Sara Moen	97103	1338. Jennifer Taylor	12065
33. Samantha Jaque-Anton	95616	1339. Nicholas Zecher	28793
34. Tamera Gest	91362	1340. Josh Standiford	60047

35. Emily Clouse	97103	1341. RUKIO SANZ	97213
36. Molly Schulp	97103	1342. Hazel poirier	34952
37. Farrah King	97103	1343. Chanler Thompson	71292
38. M. Browning	85224	1344. Savannah Heid	58579
39. James Trumper	97229	1345. Sandra Farrell	97229
40. Victoria Bergerson	97103	1346. Melissa Schreiber	04343
41. Joan'Ruth Lawson	97212	1347. Evohl Malagon	97202
42. sarah horn	25701	1348. Kelly Scherer	17257
43. Corrinne Garrison	97103	1349. Paige Galligher	44805
44. Christy Long	97103	1350. Anna Damico	60435
45. Tracy Weinmann	97103	1351. Karina Bazhenova	55372
46. Gila allen	97146	1352. Claire Morris	78723
47. Justin Grafton	97103	1353. Joanne cali	90028
48. Connie Dillon	97103	1354. Amy Huang	89121
49. Kelli Hughes-Ham	98624	1355. Jordan Stevens	22841
50. Julia Hutchison	98101	1356. Lyn Armstrong	29707
51. Christopher Hodgson	62226	1357. Michele Rogers	07712
52. George Ochsenfeld	60449	1358. Kaitlin Neiswender	17901
	o501400		
53. Julia Vieira	1	1359. Geri Ferrara	10601
54. Dana Seilhan	95531	1360. Katelin Vitali	28262
55. Scott Cadonau	97209	1361. Krystal Burroughs	33767
56. Marion Diller	95864	1362. spencer larson	10512
57. Lee Gustaferro	75214	1363. Kristen Spencer	01609
58. Shaun Firkser	E146NG	1364. Rebecca Lopez	90062
59. Brandi Hayworth	97070	1365. Scott Tedford	30253
60. Amy Stengel	78218	1366. Tara Mathews	32811
61. Dennis Mitchell	83338	1367. Kevin Andrews	14020
62. Melissa Hamilton-Gragg	66221	1368. Sarah Loveland	33470
63. Jenny Gamer	55478	1369. Angie Jones	41042
64. Christopher Randles	97119	1370. Lillian Cook	47330
65. Dylan Wirkkala	97060	1371. Baylee Lopez	87124
66. Sara Snedeker	97103	1372. Rosemary Trosper	91362
67. Megan Mackin	61434	1373. Eli Poulos	89149
68. Emilee Fransen	97104	1374. Brittney Ball	32141
69. David E Brown	97146	1375. Charlotte Janssens	02530
70. Bridget Gibson	97267	1376. Susan Smelden	50208
71. Brianna Thom	97214	1377. Ashley Snyder	65201
72. Kathy Dodge	71334	1378. Kason dwbi	71351

73. Raymond Martin	97103	1379. Millie Hreczany	62704
74. Nancy Ferber	97103	1380. gabi major	60115
75. Erin Eberle	97211	1381. daisy benitez	37013
76. Eliot Thompson	97223	1382. Kristy Mcghee	71295
77. Deanna Meyer	80135	1383. Yasmin Dunbar	10118
78. Steve Keith	14217	1384. Jaye Crues	22963
79. Alex Heart	97103	1385. Laura Fung	49330
80. Jessica Zane	01040	1386. Belle Carter	95117
81. Jason Grover	96003	1387. arlene butters	02476
82. Carley McNeice	98607	1388. aleah underwood	37840
83. Amanda Heilmann	98665	1389. Matthew Hurley	28208
84. Stephanie Brockway	97062	1390. Melissa fair	63125
85. Kyla Phillips	98663	1391. Chris Pedone	80401
86. Katherine Treffinger	97850	1392. Frances Martinez	78209
87. Shodo Spring	55021	1393. Debbie Gaab	63126
88. Daren Doss	98122	1394. Kara Giddings	98531
89. Kathleen Cooke	13827	1395. Anthony Vazquez	60087
90. Moira Ichiban	97214	1396. Maria Jay	78239
91. Sarah Faulkner	28787	1397. Kt Hertfelder	63011
92. john faulkner	28787	1398. Lena Gillett	97103
93. Lyndsay Buban	98065	1399. Bella Simon	60172
94. Tim Buban	98030	1400. Sarah Beck	80251
95. Scott Fagerland	96746	1401. Joshua Pikop	97266
96. August Hess	97031	1402. Miguel Sanchez	92860
97. Darren Orange	97103	1403. sharon reinaga	93552
98. Christiane Hayes	98632	1404. Bevely Scott	35214
99. Shannon Mathews	97206	1405. Solana S.	94104
100. Nicole Maki	97138	1406. Natalee Lyons	41230
101. Kris Hargis	98160	1407. Jessica Ford	63628
102. Shevawn Maida	92672	1408. Melissa Bertram	83401
103. Staci Humphrey	97266	1409. Lisa Scott	42202
104. Suzinn Weiss	97211	1410. Shana Redmon	91602
105. Shelly Hedges	98640	1411. Breana Nix	38863
106. Isaias Manjarrez	98902	1412. Brady misner	43209
107. Suzanne Olsen	97301	1413. Ellen Ahders	28037
108. Molly Weeks	97103	1414. JULIA BALLARD	80021
109. Heather Hryciw	94609	1415. ted hunt	98366
110. Virginia Krula	97015	1416. Lindsey Ehlis	98270
111. Bozenna Park	V6K	1417. Jacob Manning	98198

112. Desiree Hadaller	98606	1418. Robert Fetzer	80907
113. Don Gray	98685	1419. Julian C	92880
114. Mikiala Souza	97103	1420. Billie Delgado	79706
115. Andia Katz	95521	1421. Jennifer Valentine	11762
	M6M		
116. Ben McAulay	4w2	1422. Candy Fischer	62002
117. Chelsea Pollock	32164	1423. Taleigha Blankenship	45680
118. Carolyn Helmick	20152	1424. Kalani Whitney	97103
119. Deb Yeargin	60193	1425. Gregg Levine	11102
120. Rebecca Tonkin	97103	1426. Jessica Schroeder	98683
121. Laurie Kruczek	97236	1427. Kathryn Pavelo	28403
122. Gregory Valdez II	97103	1428. Dale Whitney	97103
123. Kelly Moore	97080	1429. Pam Rosenwasser	86303
124. Tim Ennis	97214	1430. Out Ivivv	80016
125. RaVen Sequoia	43227	1431. Pamela Holbert	85711
126. Stacy DeHart	04553	1432. Nicole P	18045
127. Jen Lamb	97103	1433. Cathleen Penkoff	85327
128. Kristin Howe	97122	1434. Eashc Ald'duir	31763
129. Casey Lowe	97201	1435. Sue Serafini	86305
130. Alyssa Danley	97236	1436. Arianna Wilson	8096
131. Melanie Cipher	97103	1437. Brian Sutherland	84532
			Eugene, OR
132. OYA HARRIS	08835	1438. Drew Simrin	
133. Shane Faddis	80525	1439. Emma Bartlett	97402
134. Bethany Dillight	97203	1440. Doris Queener	97146
135. Alix Daggatt	97103	1441. Julie Abel	86303
136. Brenda Harper	97103	1442. Aaron Nelson	97404
137. Madeline Pointer	97202	1443. Trish Turo	17050
138. April Shelton	40769	1444. Peggy Acosta	19567
139. Jessica Greene	91709	1445. Debra Guendelsberger	81133
140. Rowan Rumley-Wells	97233	1446. Amit Hoque	92264
141. Erin McGregor	97213	1447. Aaron Brienzo	85013
142. Andy Gurevich	97206	1448. Amber B	19149
143. Amber Fowler	97103	1449. Neal Camerlengo	49048
144. Ruby Morgan	97103	1450. TAMMY Allen	32940
145. emily gulka	97239	1451. Elena Knox	95665
146. Cameron Wagner	97103	1452. Jillian Pain	60618
147. Denise Faddis	80525	1453. Trisha Cornett	30084
148. Lynda Bianchini	18960	1454. Cindy Nardone	14468

149. Wende Larsen	97103	1455. Vince Frazier	35650
150. Nichlas Stephens	97103	1456. Tom Hess	60609
151. Rob Lewis	98292	1457. Frank M	11101
152. christina warsheski	01960	1458. Georgia Braithwaite	86326
153. Zack Pitnick	94566	1459. Laurie Ogle	46135
154. Ava Snedeker	97103	1460. Nancy McCullough	19026
155. Plano Eli	75248	1461. Joy Cloutier	34239
	Fredrikstad,		
156. Kent Inge Olsen	Norway	1462. Lisa Bedker-Madsen	98223
157. Amanda Nelsen	02128	1463. Perri Kimono	90046
158. Scott Sink	92701	1464. Suzi Drake	28428
159. Susan Taylor	97103	1465. Terri Caribardi	48170
160. Doug Taylor	97103	1466. Jack Rollens	95141
161. Sofie Kline	98168	1467. Kristen Gerhardt	51503
162. Deborah McDonough	02054	1468. Jess Beaulieu	80439
163. Anneliese Wilson	94610	1469. Adriana Nunez	91401
164. Andy McGee	97202	1470. Barbara Mahoney	59718
165. Erin Prewett	97103	1471. Ilene Choi	07094
166. Brooke Bennett	98638	1472. Melissa Haertel	10465
167. Robin Seloover	97404	1473. Joan Collins	24363
168. Aviana Pierce	97146	1474. Aubrey Johnson	39567
169. Kathryn Zamiela	60626	1475. Jeffrey Ruff	32926
170. William Kirk	97103	1476. Capt Rich Galauski	07731
171. Christina Bremner	97103	1477. MARK CLAPP	77657
172. Cindy Price	97103	1478. Debra Adcox	30114
173. Jessica Jones	10040	1479. Carrie Chaffin	86403
174. Rudy Perez	98908	1480. Maria Lofton	92614
175. Chloe Maglio	97203	1481. Anne Copay	20878
176. Erin Power	78753	1482. Cassie Craine	21218
177. Bruce Buckmaster	97103	1483. Chad Mcmann	76104
178. Sarah Landwehr	97202	1484. Ashton Shepherd	98902
179. Mindy Zelina	18036	1485. Laura Vera	77539
180. Kimberlee Lucero	97211	1486. Wendy Farrell	48350
181. Jed Herman	97103	1487. Abby Coldwell	43230
182. Pamela Tillson	97103	1488. Linda Caldwell	28079
183. Larkin Stentz	98003	1489. Kathryn Dakis	10021
184. Jessamyn West	97103	1490. Mark Gauthier	01902
185. Jill Smith	97103	1491. Aaron Kosikowski	14150

186. miles nielsen	97103	1492. Raju PATEL	07080
187. Billie Hoffman	97103	1493. Vance Berger	20850
188. Emily Greenough	97202	1494. Nathan Lang	94121
189. Hanrahan K	98225	1495. Andrea Giano	17403
190. Daniel Benke	97146	1496. Carmen Emery	18337
191. Summer Oja	97103	1497. Jesse Casper	46615
192. John McConahay	97103	1498. Maryetta Brown	20186
193. Sandra Peters	97103	1499. Becky Segall	20902
194. Sharon Gracia	97146	1500. Stephanie Murphy	62441
195. Karen Orange	99205	1501. Janet Armitage	95118
196. Becky Graham	97220	1502. Nancy Currah	82601
197. Nick Wheeler	97103	1503. Jonette Bronson	81535
198. Tonia Williams	97439	1504. Hugo Rupp	Oakland, CA
199. Philip Barasch	97103	1505. dana bernstein	91367
200. Anastacia Lane	97146	1506. Arturo Beyeler	96150
201. Bob Goldberg	97103	1507. D Graves	30301
202. Andrew Haskell	97103	1508. anna vila	08192
203. Joyce Nolan	11553	1509. melissa plante	33133
204. Autumn Hurd	97103	1510. courtney js	10805
205. Brandy Sweeney-Evrard	97103	1511. Courtney Lester	46164
206. Olaf Ydstie	97103	1512. Marcelle Newcomb	90602
207. Brooke Woolfson	98115	1513. Barbara Ventresco	44011
208. Adriana Guerrero	97103	1514. Jeanne Mcdonald	32618
209. Margaret Beres	97103	1515. Benjamin Billhardt	92337
210. Marissa Burns	97103	1516. Daniel Wright	97498
211. Janick Langley-Williams	97103	1517. Heidi Peacock	03833
212. Victoria Sage	97103	1518. Robyn Dodds	85395
213. Amanda Noyes	97103	1519. charlie burns	06850
214. Katelynn Lopes	98632	1520. Samuel Rickard	20187
215. Andrea Slatky	97103	1521. Barb Morrison	33774
216. Kirsten Meneghello	97229	1522. Nancy Pointer	95123
217. Peg Cadigan	53092	1523. Elizabeth Jonasson	95060
218. Susan Stein	97233	1524. Fernando De Sousa	85048
219. Rebecca W.	97367	1525. Finn McDonald	99337
220. Kayla Fermin	97233	1526. SARAH GARN	40511
221. Chris Howard	93434	1527. Lisa Penney	V5K
222. Mylasia Miklas	97103	1528. Robert Patterson	89701
223. Debra Kosup	53073	1529. Dan Less	27265

224. Dinah Urell	97103	1530. Louise Cybulski	80129
225. Rhonda Piasecki	97213	1531. Elaine Lockwood	90706
226. Julie Moore	97103	1532. Paula Neville	14626
227. Bella Perez	98908	1533. Kathleen Obre	92651
228. Lee Ann Van Dyke	97103	1534. Michael H	64601
229. JENNy much	98160	1535. Martha Kelley	75287
230. Luann Jacobs	97103	1536. Marilyn Groshong	63701
231. R Marshall	97202	1537. ruth kurtz	11373
232. Laken Harrel	97220	1538. Melodie Palmer	76051
233. sarah faulkner	28761	1539. Edward Gutierrez	08691
234. Sarah Lippold	97138	1540. Tony Peterson	46239
235. Anna Daedalus	98643	1541. ROD & VICKI KASTLIE	92107
236. Janie Lowe	75234	1542. Linda Cain	32807
237. Mary Lattimore	19125	1543. Nicole Sabetta	02921
238. Amy Magnussen	97103	1544. BETH TAYLOR	91945
239. M Cooper	97209	1545. Rayza Perez	92227
240. julia barbee	97216	1546. Susan Sullivan	90016
241. Susie McLerie	97103	1547. Steve Bates	76021
242. Sarah Barrett	97222	1548. Mac Walter	36535
243. Nikki Cormaci	97210	1549. Kevin McCluskey	26508
244. Mate Tulipan	90029	1550. Jeffrey Joyce	04038
245. Brian Foote	90065	1551. Joy Turlo	90277
246. Carly Ng	97217	1552. Brad Small	60187
247. Jonathan Saucedo	60516	1553. Stephanie Bush	37343
248. Jessica Fortino	98105	1554. Anthony Ricciuti	32746
249. Jennifer Crockett	98661	1555. Laura Clement	04408
250. Debra Fisher	98644	1556. Ted Emerick	18042
251. Yolanda Lemarr	98909	1557. karen spurr	20187
252. Willow Lemaer	98908	1558. Trent Waite	55416
253. Josie Fitzsimmons	83239	1559. DARYL GUERIN	60126
254. Jayden Licea	78572	1560. thomas ricobene	60632
255. Teri Sund	97103	1561. Jon Harrison	39401
256. Sean McMullin	17543	1562. Tara Sparks	08330
257. Erich Abbo-Mott	98031	1563. Mariana Ivanova	79401
258. Heather Nichols	97103	1564. Kim Koch	97131
259. Emily Taormina	97202	1565. Gilda Levinson	33071
260. Anna Laidler	18301	1566. George Dunlap	19966
261. Megan Earsley	90272	1567. Priscila casas	94544
262. Bianca Butler	97211	1568. J.A. Krist	10470

263. Daniella Fisher	74344	1569. Randy Simon	90210
264. Siena Giljum	91001	1570. Rhonda Ontiveros	65781
265. Ivy Della porta	T5H	1571. Paul Stancheff	95971
266. Shana Powell	97222	1572. J H	93277
267. Erika Callihan	97212	1573. Kevin Ristow	53215
268. Ryland Parkey	37932	1574. Jan Horwitz	62221
269. Caitlin Moore	97202	1575. Susan Moh	20019
270. Johnny Slack	12428	1576. Dawn Reaume	48154
271. Shane Neilson	98531	1577. Maureen Tunney	93001
272. Martha Van dyke	97103	1578. Michelle Dail	23666
273. Josh Staley	97103	1579. Syd Beddingfield	30189
274. Wytske van Keulen	97103	1580. Catherine Phillips	30019
275. Brookley Henri	97214	1581. Alyssa Darlington	45011
276. Chelsea Gaither	97103	1582. Lisa Hawk	23223
277. Kate Perkins	97239	1583. Roland L. Crapo Sr.	06010
278. Jeanna Edmondson	97301	1584. Sandra Romito	97201
279. Cilia Pittman	23452	1585. julie doto	08901
280. Audrey Kanapaux	97103	1586. Leah Stables	32187
281. Paul Markillie	48439	1587. Corey Meyers	33809
282. Shawna Neumeister	97146	1588. Angela J Hawkins	23225
283. Geena Barker	97219	1589. DIANE AMIEL	91423
284. Brandon Massey	97202	1590. Kathy Smith	30024
285. Kathleen Duffy	97202	1591. Elaine McDowell	11741
286. Jen Olesen	97219	1592. JEFF CARNEY	01824
287. Miranda Rinks	97103	1593. Assem Al Tawdi	94080
			97478-55
288. Lisa Minnear	97103	1594. Sheila Hunt	08
289. Michael schneider	97230	1595. Arna Cortazzo	32955
290. Sheryl Paul	97146	1596. james jackson	80206
291. Lucas Jones	97211	1597. Laura Reno	95819
292. Rusti Hadaller	98579	1598. Christie Rodriguez	91335
293. Sophia Brunn	87439	1599. Maro Aroutiunian	60130
294. Stephanie Dearn	MK17	1600. thomas jones	94708
295. Eva Saelens	95949	1601. Peggy Jakopak	57045
296. Melanie Steffl	97701	1602. Marie Dior	20777
297. Isela Guadalupe Martinez	92405	1603. Paul Pfau	45205
	Quezon City,		
298. Pinky Dasco	Philippin	1604. Alison Hodgdon	84057

	es		
299. Shawna Lewis	97103	1605. Jennifer Vogel	10004
300. Jill McVarish	97103	1606. james jackson	80238
301. Patricia Thomas	97146	1607. Juliann Rule	56310
302. Miriam Haas	56743	1608. Joshua Barrientos	60647
303. Amanda Curtis	97103	1609. Kay Baker	97702
304. Sally Turchetta	97219	1610. Kelly Deringer	28557
305. Hillary Trusty	98644	1611. Catherine Northcutt	98027
306. Paul Holsinger	97146	1612. Andrea Chisari	32754
307. Ashley Stroh	98607	1613. Vicky Williams	29922
308. Kimberly Bolin	97138	1614. Jackie Morgan	95258
309. Colleen Engels	97146	1615. Douglas Davidson	24184
310. Derek Ecklund	97103	1616. carrie west	47303
311. Todd Schryver	11217	1617. Phyllis Allinson	92046
312. Nancy Marschel	97138	1618. Sylvia Cardella	95547
313. Lisa Lavine	10031	1619. Barbara Jacobs	33449
314. Latasha Burns	98168	1620. Heather Lutz	92672
315. Elizabeth Nichols	97103	1621. N G	91367
316. Dolores Matthys	97138	1622. Johnson George	93013
317. Jordan Okoniewski	97103	1623. John Marro	60638
318. Andrea Mazzarella	97103	1624. Carolyn King	60620
319. Louie Miller	84025	1625. Teresa Yuan	20151
320. Alexandra White	97202	1626. Cindy Burbank	98499
321. Anna Richards	97103	1627. GARRY DASHNER	65769
322. Thomas Giles	92651	1628. Laura Fritts	21120
323. Eric Grey	97103	1629. Grace Reynolds	46818
324. Scott Ferguson	98168	1630. Allyson Rogers	19422
325. Leah Conroe-Luzius	80220	1631. Tracy Reyes	53714
326. Camille Davis	90706	1632. Laura Bogni	94510
327. Gail Cameron	97222	1633. cheryl minieri	01950
328. Stuart Emmons	20783	1634. Susan Bates	92675
329. Jay Spottswood	97103	1635. Alison Abbott	77373
330. Mary jane Cotta	49309	1636. Christine Wagner	07834
331. Russ Farmer	97210	1637. Walter Buhner	11792
332. Deborah Michaels	44092	1638. ronald paich	60632
333. Corey Harn	97103	1639. Ruth Norris	86303
334. JEFFREY DALY	97233	1640. Marilyn Malave	10901
335. Sri Pfuntner	97138	1641. Jenny Tabb	11743
336. Karen Angier	97103	1642. Penny Jones	10012

337. Andrenise jean	34953	1643. Justin Perry	97217
338. Teresa Barnes	97219	1644. chris wulkiewicz	37401
339. Ralphie Beam	21502	1645. Marty Hecht	60015
340. Merianne Myers	90280	1646. Laurie Pearl	92037
341. Madison Kennedy	97103	1647. Nolita Nelson	51334
342. miya chiodi	60030	1648. Robert Brown	17878
343. Tracy Goodenough	97146	1649. Suzy Berkowitz	33470
344. Sarah Jane Bardy	97103	1650. John Weeks	13665
345. Nicholas Moore	97230	1651. d Cole	62685
346. Luellen MdeOca	97103	1652. Julie Genaway	13027
347. Susan Skinner	97103	1653. Cristine McConnell	96708
			30329-28
348. nate moore	97103	1654. Steven Nelson	21
349. Laurel Bobzien	97206	1655. Kathryn Schemehorn	46038
350. Dinah Davis	97759	1656. Missy Harris	37205
351. Twila Pierson	97103	1657. Magda Poirier	03246
352. Karola Hitthaler	97103	1658. Heather Black	08827
353. Teresa Keippela	97233	1659. Susan Borys	27455
354. Virginia Edwards	97131	1660. Nethaji sellappan	30328
355. Terri Sweet	97129	1661. Donna Hull	78645
356. Dan Negley	97103	1662. Juana McDonald	86303
357. Valerie Omsted	97138	1663. Hayley Somers	80214
358. Jacob Lewin	97103	1664. Roxanne Christie	13131
359. Florence Sage	97103	1665. Brenda Polacca	88011
360. J. Kramer	60517	1666. Diane Quinlivan	80229
361. Gail Wahlstrom	98638	1667. joe otoole	60657
362. Lisa C Smith	97102	1668. Barbara Santoro	11379
363. carla cole	97103	1669. Linda Pfeiffer	20009
364. Eric Wheeler	97103	1670. Kameryn Burt	46224
365. Sharon Johnson	97138	1671. Michelle Krueger	46410
366. Randy Avalos	94025	1672. Don Krueger	46410
367. Sarah Simpson	98502	1673. Matt Hennessy	33486
368. Danielle Cepeda	97103	1674. LAWRENCE CAPLIK	06478
369. Marlene Bekins	97193	1675. Hoby Van Hoose	98117
370. Raeann Morton	77063	1676. Salissa Chavez	85140
371. Jacob Hurd	97103	1677. Sheldon Rosenblum	11363
372. Paul Blackburn	42701	1678. Marlene Phelan	10980
373. linda oldenkamp	97103	1679. Von Robinson	64130
374. Scott Mason	91356	1680. Joan Karol Anderson	13440

	33929-0		
375. Jerry Mouse Martinez	171	1681. Nereida Chavez	78209
376. Evan Jones	11208	1682. Kim Hawkins	41031
377. Judith Huck	97103	1683. Joseph Kenosky	18360
378. Jordan Burford	97103	1684. Joelle Porter	96130
379. Nathaniel Perry	97138	1685. Lynne Sorrentino	92592
380. Reina Trumpet-Muyet	21136	1686. Brea Viragh	33314
381. john urbonas	60586	1687. Chris V	10302
382. Lauren A Mills	97110	1688. David Finch	30144
383. Kim Schooley	33458	1689. Tina Durakov	18017
384. Donald wleklinski	47803	1690. Kathy Flocco-McMaster	33764
385. Madilyn Hays	50146	1691. Ellen Pomeroy	10028
386. Kindwyn Hoge	97138	1692. Yasotha Sriharan	01007
387. Thomas Wells	6424	1693. Andrew Turney	61550
388. Shawn Steen	97138	1694. Gina Ward	63129
389. Linnea Alley	99209	1695. Lois Kovacs	48892
390. Hatridge Rocky	97138	1696. SARA KNAB	14072
391. Thelma Weeda	3036	1697. Danny Lewis	47715
392. Scott Robinson	49319	1698. jeanne lutz	49417
393. Tina Chapman	97527	1699. Kevin Burke	34212
394. Amy Davies	97103	1700. Billy Gann	36547
395. Cindy Baker	97138	1701. Mark Gibson	97103
396. Dawn Perez	98112	1702. Adriana Stout	80908
397. Staci Sebestyen	97103	1703. Linda Negele	60564
398. David Brasmer	97103	1704. Jenifer Black	75206
399. Heather Johnson	32405	1705. Tiffany Blenis	38133
400. Raegan Steele	43054	1706. Michael Lawrence	15636
401. Susie Conway	80922	1707. Miguel Sanchez	74129
402. Teresa Whittington	97103	1708. Timothy Perkins	93225
403. Cashton Hanley	54111	1709. BARBARA GALLAGER	70529
404. Debbie E	19943	1710. Christopher Langford	77590
405. Iris Douglas	97146	1711. Naz Khaleh	91306
406. Joshua Olson	97103	1712. Deborah Casselbury	22003
407. Eat Laz	73701	1713. Mikayla Rogers	39503
408. Amy Hacker	45788	1714. Rebecca Bruckner	06339
409. Asher Wallis	97045	1715. Carline Vidal	33304
410. Linda Freeman	95991	1716. Jennifer Greenwood	62526
411. Jason Barthel	60647	1717. Donna Davenport	30033
412. Norm Wilmes	95991	1718. Patrick Martin	80521

413. Joanna Miller	36544	1719. Stacy Hagan	11779
414. Devin Livingston	30277	1720. Ingrid Eiserbeck	93142
415. Robert Madera	33021	1721. Lucy Wolpin	02445
416. Heather Isaac	92084	1722. Leslie bond	98685
417. Marissa Rizzo	33418	1723. Margaret Meinert	29072
418. Melinda Kinnaird	71913	1724. Julia Green	98122
419. Mackenzie Baranski	48471	1725. Tim Maurer	92808
420. Joshua Decker	62656	1726. Jane Oberbeck	36580
421. Elizabeth Long	32811	1727. Laury Emerson	97136
422. Stephen Costa	2150	1728. Abigail Duarte	92083
	EX5		
423. Victoria Salter	2QX	1729. Dave Crudele	12020
424. Christopher Williams	27330	1730. Sabrina Sarne	94526
425. Sheila Berry	97136	1731. Brenda Hansen	60602
426. Jennifer Quigley	97103	1732. Henry Cavallari	86301
427. Taylor Tingley	49203	1733. Jamie C	29574
428. Franklin Matias	11211	1734. Jennifer Taylor	30024
429. Jean VanEtten	98233	1735. Aubree Morris	99207
430. Kevin Moore	78750	1736. Celeste Harvey	21044
431. Karen Kimbaris	30606	1737. Victoria Fasano	06339
432. Olivia Loupe	95023	1738. Alex N	10314
433. Debra Linton	87015	1739. Valerie Nava	92571
434. Sarah Jeffreys	84532	1740. Cornelia Layton	80027
435. Jonas Norwood	83460	1741. Jamar Jefferson	30294
436. Dallas Folks	93105	1742. Jen Scibetta	14225
437. Andrew Lewis	84098	1743. Imelda Bueno	92706
438. Mike Falco	50023	1744. Arsene UrMom	10509
439. Rocio Jimenez	90001	1745. LESLY DERBYSHIRE	90022
440. Bryanna Mancillas	81301	1746. Lisa Zarafonetis	75214
441. Marcy Kaufman	44121	1747. Fred Morrison	94544
442. Dale Kaufman	44122	1748. Mina Mani	77036
443. Tanya Romero	85027	1749. Nevada Rousey	31794
444. Loki Magnusson	95610	1750. Damien Johnson	90807
445. Alelxis Torres	34610	1751. Ariana Medina	94949
446. Jennifer Vanni	97217	1752. Francis Porfilio	10306
447. Mabry Biggs	37174	1753. Eric Leja	02301
448. Nicole Keb	94134	1754. Marilyn Galvez	33401
449. Patricia Benitez	16354	1755. Diane Paige	03766
450. Ed Overbay	98160	1756. Megan Varvir.Coe	75009

451. Robert Ortiz	94945	1757. Jessica Taylor	21532
452. Debra Cruz	93306	1758. Todd Gordon	44145
453. Suzinn Weiss	97213	1759. Jill martin	19426
454. Lisa Alan	97219	1760. Michael Whaley	40291
455. sherry hill	28401	1761. Lucas Hill	46112
456. Annmarie Corkett	11418	1762. peach umbrella	05403
457. Chester Holland	28208	1763. Manda Ness	55906
458. C Scio	96701	1764. Ulrike Zomorod	91732
459. Felicia Boudreau	89130	1765. Eileen Grima	60504
460. Dianne Gohmann	83687	1766. Christian Fowler	47274
461. Pat Perez	78501	1767. Charlotte Steck	14225
462. Kathi Fischer	92691	1768. Tara Hottenstein	33707
463. Kimberly O'Bryant	97103	1769. Camryn Wood	10009
464. Tara Harris	28462	1770. erica rouse rouse	99166
465. Brafne Heiwer	84043	1771. MARIANNE MONSON	38652
466. Jennifer Dean	24014	1772. Kathy Tucker	97202
467. Kelli Hedin	98368	1773. Edith Casterline	97214
468. Vivian Seidenstucker	83605	1774. Don Golden	97212
469. Emily Stebbins	97206	1775. Jon Petras	92264
470. Laurie Ellis	33952	1776. Adi Golden	97212
471. Katie Lane	02155	1777. Tania Ewing	97394
472. Ed K	98225	1778. Rob Pulito	11714
473. anne ellis	33952	1779. Candace Tucker	99711
474. James Hoots	27019	1780. Jomathon Campbell	38023
475. MARC NEDERLK	14647	1781. Renae Bowman	29687
476. Mark Lessner	93555	1782. Don Drennen	26301
			Los Angeles, CA
477. Tammy Coble	75189	1783. David Angler	
478. Alissa Thurman	99654	1784. rachelle gardner	33461
479. Lori Wells	30642	1785. Harvey Golden	97103
480. Mark Cooney	33433	1786. Trista Jones	97214
481. Tamara Perkins	33991	1787. Eban Cooper	48374
482. Jenna Cook	76543	1788. Alex Stevenson	84037
483. Chris Hatten	97383	1789. Gail Greenlee	91311
484. Marne Lucas	10025	1790. Alyssa Crawford	85249
485. Ken Crown	97209	1791. Kristen Solano	80227
486. Mary Grace de laSalandra	97103	1792. TJ LeMonte	44683
487. Justin L'Amie	97212	1793. Connor Lunt	92405

488. Holly Harmon	46176	1794. sue carpenter	68061
489. Tommy Schram	97214	1795. Diana Albornoz	11104
490. Kenneth E Booth	97103	1796. Jacquelyn Michaud	04103
491. Jean Gloff	38016	1797. narda Castro	06790
492. Rocky Faulkner	97103	1798. Jose Cruz	93662
493. Cesar Raya	97103	1799. jamie Pate	48340
494. Jocelyn Rodriguez	97146	1800. Alexa Wall	02648
495. Elise Wagner	97103	1801. Kylieanne Vaultonburg	61054
496. Mark Woolsey	99216	1802. Rita Thio	91789
497. Tanja Schacht	89522	1803. Jennifer Pompei	17111
498. susan roberts	34990	1804. LISA HEY	06098
499. Christine Dolan	63050	1805. Maria Aguiar	03054
	Fort Lauderda le, FL		
500. Amanda C		1806. John Smith	46203
501. Timothy Fisher	43606	1807. Nancy Wu	60603
502. Tia Degerstedt	97141	1808. steve copple	97107
503. Jennifer murray	63116	1809. Erin Eitel	19128
504. Thomas Duncan	97103	1810. Christian Toland	75211
505. kadin shepherd	55811	1811. Sophia Soto	27614
506. Cris Tranter	75089	1812. Lily M.	28394
507. Thomas Askew	49428	1813. Katie Person	98118
508. Julie Hackett	97103	1814. Ash Beans	97206
509. Annie Lenihan	13411	1815. Jacob Keen	53219
510. Sonya Talavera	92701	1816. sich roll	35802
511. carine correc	33139	1817. Mary Tardif	05842
512. Julianna Havens	37076	1818. Maggie McClinton	27410
513. Dan De Yo	92886	1819. Bryan Obi	75007
514. Margaret Gould	02136	1820. susan michniewski	08525
515. Alana Preziosi	08094	1821. Etzar Cisneros	35206
516. Melinda Nickels	97103	1822. Rachel McDonald	94597
517. tracy hefner	37909	1823. Fred Chambers	97402
518. Gail Curtis	97206	1824. Karen Engle	18220
519. Andrea Berliner	97103	1825. Sulema Sacre	33607
520. Jessica Wood	06605	1826. Unknown Weeb	23320
521. Kayla Williams	97103	1827. Virginia McArtor	44709
522. Mary Mann	97214	1828. Clare Borsari	37849
523. Rebecca Parmenter	80023	1829. Isabella Vargas	90059
524. Taylor Johnson	97103	1830. Joyce Merrill	34209

525. Marie Richey	97405	1831. Beth Weissman	10562
526. Doris Kitchen	28739	1832. Kiah DeSarro	92103
527. Caitlin Callahan	97103	1833. Lila Florence	32034
528. Bernice Williams	98660	1834. Alex Randow	60068
529. Olivia Bailey	97103	1835. Susannah Sulzman	12208
530. Olivia Joyce	97214	1836. Doris Pierce	77056
531. Joyce Lizardo	98662	1837. Janice Lee	99353
532. Jonathan Oxford	97209	1838. Kelly Kain	30309
533. Kyra Grafton	97103	1839. Naidy Castanon	27705
534. Tim Gaston	98685	1840. Megan Davis	84041
535. Alison Bartish	97211	1841. Emily Forquer	32065
536. Kenneth Bess	32869	1842. Kenneth Boggs	98632
537. Angela Todd	97212	1843. Betty Gosnell	34104
538. Dasha W	97211	1844. Clay Harrison	89115
539. Katherine Beymer	97230	1845. Philip G	21014
540. Evelyn Macpherson	97209	1846. Roberta Malanowski	75063
541. Marianne De Vera	20902	1847. Hector Martinez	76955
542. Nianna Bray	97202	1848. Star Hanks	08810
543. Dr Paula Macfie	97233	1849. Rossana Velez	00693
544. Christine Taylor	97210	1850. Sadi Hoti	02169
545. Maria Mendez	97325	1851. Ana Aguayo	90803
546. Michelle Morgan	95117	1852. Shahriar Rahman Khan	44240
547. Ally Kelly	97214	1853. Christine Mason	R3B
548. Todd Johnson	97068	1854. Amy Pope	66047
549. Sea Cummins	97229	1855. giselle ellis	89101
550. Serrena choun	97035	1856. E S	WA2
551. Harris Harper	96754	1857. Gloria Reyes	77063
552. Julia Johnson	97103	1858. Janis Labroo	13820
553. Van Kincaid	97229	1859. Robin Goff	46037
554. Elona pope	97068	1860. Lisa Barr	38606
555. Jennifer renderos	97221	1861. Karol Baca	85375
556. Cody Woodbury	97236	1862. Nicholas Owings	43040
557. Krystal Jacobus	98682	1863. Molley Bevan	98004
558. Alex Kowtun	14843	1864. Daniel Garcia	92508
559. Mary Bills	97202	1865. Rochelle Douglas-Holt	63143
560. Hanna C	97233	1866. Jeff Thomason	65203
561. Nicole LaDouceur	97202	1867. Zanay McDaniels	93304
562. Nicole Ogle	97128	1868. Ilene Morris	84106
563. Mary Ann Viveros	44124	1869. Anthony Saporito	19020

564. Craig Hawley	46214	1870. Patricia Stewart	88001
565. Michelle Lindhartsen	99352	1871. joseph geiger	36869
566. Terra Mowlds	97060	1872. Shelley Etheridge	23464
567. Francisco Garcia	97201	1873. Kawsar Khan	48326
568. Francis Rinaker	97212	1874. Mark Acevedo	95829
569. Faith Peacock	97007	1875. Leann Leo	07675
570. Cassie Malaer	97217	1876. Kristin Harder	60202
571. Deborah O'Brien	97007	1877. Barb Reinoehl	62454
572. Anna Hinkes	97219	1878. James Charlton	89415
573. Mikayla Prince	37209	1879. Joseph Sukackas	85036
574. Meg Cotner	97213	1880. Matt Pavlik	13790
575. Marcia Thuren	98160	1881. kimberly a hurley	07046
576. Holly Brandon	97030	1882. Stephen Louchery	29435
577. Chrystal Erhardt	33547	1883. Alexandra Rosen	18914
578. George Montejano	97215	1884. Eric Morrison	61846
579. Trevor Hoagland	97502	1885. Nishah DiMeo	27408
580. Jim Head	48237	1886. Christopher Bell	32808
581. Amanda Ashlock	97203	1887. R Sheryl Reed	62338
582. Ashley Stewart	97132	1888. Kathy Clark	02019
583. Amy Boda	97202	1889. Helen Busch	14225
584. Emma Leno	97347	1890. Piper Stam	58078
585. Eric Finley	97202	1891. Mark Lucchino	10010
586. Catherine Griffith	97224	1892. Heather Riley	7094
587. kelly lewis	97219	1893. David Gray	46158
588. Patty DeBois	97223	1894. Eileen Camaclang	94534
589. John Lembo	78418	1895. Amanda Carp	90037
590. Meredith Malnick	97214	1896. Christopher Myers	37311
591. Shelby Wick	97212	1897. kevin rosario	08830
592. Shannon Nichols	97116	1898. Erin Farley	33713
		Christopher Joseph	
593. Carol Book	17406	1899. CHALMERS	34609
594. Kelly Lanspa	97252	1900. Akash Sabir	20783
595. Lisa OBier	97078	1901. DeAnna Schaefer	99645
596. Lacy Wells	97203	1902. Diane Glennon	14048
597. Andrew Rodgers	97224	1903. Deborah Duenas	94901
598. Michael Spence	97210	1904. Rebecca Lipton	97478
599. Lawrence Siska	60193	1905. Bonnie Hauck	97233
600. Kate Macdonald	97214	1906. Susan Smith	97401
601. Nick Pearson	97217	1907. Michael Lang	98198

602. Natalya Amalbert	98664	1908. Raul Cervantes	91335
603. Veronica Smeltzer	97219	1909. Stacy Rysak	32118
604. Crystal Zumwalt	98902	1910. Estefany Mendez	91914
605. jeremiah owens Owens	97209	1911. Riley O'Shell	23513
606. Brisa Gonzalez	97266	1912. Brandon Acevedo	60666
607. Cynthia Johnson	97211	1913. Patricia Brandes	96822
608. Gina Banuelos	97008	1914. Ian Scheil	14616
609. Jerilyn Lindquist	97222	1915. TOM VARELA	91335
610. Kimberlie Lairson	97221	1916. Alex Williams	90601
611. Hali Snuffin	98661	1917. Matthew Stauffer	55478
612. Alex Zimmerman	97214	1918. Skibidi Toilet	48227
613. Melani Brown	97303	1919. Chris Thoma	99205
614. Janet Fryer	97103	1920. Elizabeth Golden	97131
615. Phuong Van Horn	97103	1921. Melinda Deida	31907
616. Mary Docherty	97146	1922. Sandra Bee	48309
617. carol malnick	94025	1923. Mary Ordonez-Korn	97239
618. Joan Splinter	97103	1924. Robert Rink	19152
619. Denise Moore	97103	1925. Bridget Hurley	80210
620. N Price	78028	1926. Salma Y	08752
621. Aaron Hogan	76209	1927. Rafael Diaz-Larios	38305
622. Kristy Westfall Moyer	97121	1928. Carol Valentine	97538
623. Stefanie Hui	97060	1929. Greg Jacob	97124
624. Kasey Breuier	97007	1930. Keri Lane	50263
625. Manju Sharma	44129	1931. Jennifer Dresda	07026
626. Erin Valentine	78612	1932. alyxx creller	52317
627. Morgan Stimson	97408	1933. Kally Moore	44024
628. Beverly Wright	97503	1934. Kensington Clynes	62521
629. Jessica Mitchem	80214	1935. Donna Kramer	60020
630. Karen Cook	97060	1936. Kimberly Hutkin	33755
631. Katherine Cornell	28540	1937. Kailee Js	90013
632. Ellen Lewis	95403	1938. Tonya Goss	29631
633. Madison Saunders	91741	1939. Macrina Rodriguez	11357
634. Liz Erpelding-Garratt	32086	1940. Breana Najera	92324
635. Nicole Jones	97201	1941. Charles Wotring	25550
636. Doug Rowe	93401	1942. Brendan Bolden	60625
637. Erik Freeman	97124	1943. Michelle Thompson	28202
638. Annemieke Blekkink	4760	1944. Bridget Eason	94519
639. Alexis Russell	97222	1945. Margaret Quade	75067
640. Nancy Montgomery	97103	1946. Amber Shanks	61846

641. Anita Seeley	97015	1947. Tonia Mcelligott	62234
642. Lori Spencer	97838	1948. Jacqueline Bartz	02116
643. Liz Bustamante	97202	1949. Gabriela Martínez	75228
644. Vicki McAfee	97103	1950. Adrianne Adrianne	85022
645. Josie Lilly	97103	1951. Jacqueline Kosinski	80020
646. LISA COX	97215	1952. david rooker	49341
647. Eugene Levant	11218	1953. Raphael Lande	99258
648. Jordan Fedance	30213	1954. Jabar P. Chisholm	30341
649. Michelle Krause	97239	1955. Heather Anderson	21793
650. Polina Sergeev	97317	1956. Dawn Robertson	08753
651. Melissa Wiechmann	85381	1957. Jean Lo bue	92210
652. George Bourlotos	07801	1958. Md Rahman	10030
653. A Martin	75044	1959. Judy Bensinger	86327
654. Noel Beeler	97233	1960. Madysen Fortner	12166
655. Leanne Stoneberg	97124	1961. Jennifer Loth	43469
656. E J Rhodes	72758	1962. Juli Bossert	73099
657. Cynthia Buczkowske	60480	1963. Stephanie Latham-Magee	06790
658. Ellen Ashcraft	97045	1964. Texanna Fernandez	26101
659. Edward Markushewski	35801	1965. Janet Downing	97531
660. Dianne Radmore	V0R	1966. Valerie Philebaum Smith	48821
661. Amy Honeyman	97230	1967. Tyeba Hossain	10118
662. Sherry Russo-Card	97206	1968. Lisa Tatera	60614
663. Amanda Smith	97429	1969. Robert Rieu	10011
664. Patrick Green	97016	1970. Keila Bruno	76549
665. Denese Klemple	97103	1971. Wendy Jefferies	32548
666. Jodi Shea	79072	1972. Mindy Vanderford	77006
667. Pearl Rasmussen	97218	1973. Giovanni Rios	53711
668. Elizabeth Evans	97068	1974. Gray Czegledy	94010
669. Shelly Willis	97202	1975. dennis knaack	19141
670. Elizabeth Parkhurst	97214	1976. Ariana Griffey	19018
671. Samantha Duffy	97223	1977. S P	11237
672. Cherie Durkin	83301	1978. Valeria Hernandez	89107
673. Mason Lord	95667	1979. K More	94019
674. Tom Atha	91801	1980. Jo Ann Kovar	50010
675. Bianca Bogdan	97266	1981. Ahsha Staiger	97103
676. Melanie Stout	97008	1982. L C	96738
677. Sada Combs	97239	1983. Julie Gregory	75094
		Suzanne	
678. karen bain	97103	1984. JelenseHoodecheck	55987

679. Angela Jones	64081	1985. Gary Powell	92373
680. Tammy Shaw-Addicks	97009	1986. Tiffany Jones	27404
681. JOY Rheame	97068	1987. emma dummer	68107
682. Stephanie Kotka	97070	1988. Destiny Maddux	80910
683. Jolene Dickerson	97211	1989. Pat Grivetti	90048
684. Justin Rinaker	97211	1990. Gabrielle Yellinek	11427
685. Rachel Speakman	97138	1991. Shirley Motyl	12010
686. Miel Paredes	97217	1992. Lilly Smith	78114
687. Daniela Rossi	83756	1993. neil TASSONI	55416
688. Maya Rahr	Copenha gen, DK	1994. L M	77433
689. Janet Romoff	33068	1995. Gary Lafollette	37862
690. Thea Sames	04106	1996. Destiny Webster	93636
691. Mary D Moderacki	10016	1997. Shaun Kelly	14411
692. Jenny vaca	33174	1998. Terrie Williams	77662
693. the mazing	84653	1999. sarah gambino	12561
694. TAMMI PRIGGINS	44095	2000. Timothy Pitts	74114
695. Stephanie Della Porta	V1E	ELIZABETH	
696. Aislinn Kerchaert	97103	2001. ALLANCORTE	91942
697. Chloe Reed	98409	2002. Lynn Reeser	32409
698. detournay isabelle	01190		60077-18
699. Richard Reece	30830-7 023	2003. Jaclyn Bitensky	22
700. Erin Perkins	45040	2004. Chelsea Davis	40165
701. Sophie Strand	12401	2005. Amy Walsh	02127
702. Sara Pribila	15112	2006. Jill Roeder	98374
703. Jenna Viscuso	94541	2007. Kaylie Fritz	68333
704. Bara Rausalova	90042	2008. kay gata	91501
705. Ashley Wolf	97214	2009. Kacey Monley-Meulman	29730
706. Joe Lewis	20783	2010. Hunter Clark	20904
707. Michele Reid	49015		Bursa, Belgium
708. Edward Faivre	34987	2011. Gizem Akgün	97138
709. Rohan Singh	78578	2012. Jackie Simila	85140
710. John House	87506	2013. Julie Barber	94303
711. Dee Bialczak	60457	2014. tessa coop	78619
712. taylor webber	63123	2015. Josiah Burns	84037
		2016. Lynette Olney	33236
		2017. Hollie Kenny	79772
		2018. kamryn tooley	

713. Kevin Smith	33771	2019. Gordon Poston	29556
714. Kay buhler	77901	2020. Kelly Garcia	84045
715. Deborah O'Rear	37924	2021. Crystal Huling	40045
716. Valerie Howell	75074	2022. Shannon Akens	48134
717. Michael Varichak	80231	2023. Kimberly Green	21776
718. Kerri Smith	97101	2024. Dorothy Cross	77399
719. Maria Napoli Ali	07726	2025. luke Almendarez	78749
720. Albert Raczka	92251	2026. Nan King	97103
721. D E	97128	2027. Abigail Weirich	44134
722. Jarrod Dover	66219	2028. Beth Goetz	58103
723. Grace Robinson	97322	2029. Diane Gilliam	93560
724. Caroline Ko	94550	2030. Tina H	66048
	30078-2		
725. Laura Dancovici	722	2031. Sabrina Francisco	75647
726. Lalie Burns	78239	2032. Ayako Early	92057
727. Colleen Strabala	84020	2033. Chris Dinosaur	30301
728. Will B	2301	2034. Ariel Sierra	95687
729. Sally Barry	80127	2035. GRETCHEN VARELLI	7764
730. Allan Morrison	60546	2036. Deborah Noack	92057
731. Marc Strauss	08833	2037. Rina Sunar	17543
732. Paul Schwartz	33330	2038. Jason Mehlhop	81004
733. Brandie Deal	98021	2039. Mr. Swegg	32809
734. Rose Marie Wilson	11793	2040. Angelika Stark	33904
735. Lindsey Hightower	64114	2041. Virginia Leslie	27516
736. Alan Bartl	95401	2042. James Desiderius	15317
737. Mary Kulish	23009	2043. Laura Serma	90026
738. Dale Hubbard	01742	2044. Rebekah Krause	92562
739. Jana Harker	91364	2045. Kathryn K	60062
740. kathleen devaney	19064	2046. Corla Dailey	92154
741. Joan Klinger	65202	2047. Gretchen Roberts	44012
742. Barbara Grosmark	11050	2048. Rosemary Rukavena	14850
743. Dorothy Vaughn	80924	2049. Sharon Daskal	85224
744. Holly Mitton-Cowan	28083	2050. Edna Scheifele	18049
745. keith powell jr	02675	2051. Brian Nerat	54143
746. Alexandra Herrera	91387	2052. Paul Moser	97267
747. Don Bergey	27106	2053. Steven Bartholow	53705
748. Curt Jordan	78759	2054. Judith Riddell	61802
749. G. Simmons	06451	2055. Nancy McCormick	93720
750. Tedric Potzka	85201	2056. Brandon Fisher	08873

751. Mark Clear	80211	2057. Mark Mullen	55413
752. Annmarie Bachand	29415	2058. Lisa Strand	81623
753. Kim Goslant	02140	2059. Kalina Fischer	20852
754. Sherri Paul	27502	2060. Raquel Narvios	94134
755. Sharon Boies	21044	2061. Alexia Linzie	47933
756. Chad Leming	70117	2062. Caroline Memnon	10004
757. Anna Whitener	28428	2063. Luann Carbone	06443
758. Philippe Laurent	28352	2064. Amy Cuneo	02066
759. Monica Cordova	77450	2065. Kevin Ross	89110
760. Pati Davis	98589	2066. Jeff Ligouri	95116
761. Cathy Lewis	47715	2067. Eric Pulido	91722
762. David DeRocker	07960	2068. G F	05764
763. Ken Neuhauser	43213	2069. Mahdiyeh Jabbarian	10013
764. Gay Clodgo	97103	2070. riona zheng	10007
765. Tim Leighton	28278	2071. Abby Lassiter	36532
766. Nellie Medlin	38134	2072. Hussein Albadri	48228
767. Blythe Montgomery	64138	2073. Ezy Montes	97216
768. Monica Yonangitti	93726	2074. rosemary torossian	91423
769. Carole Scott	63130	2075. Jazayah Dambreville	33167
770. g r	08742	2076. Morgan Hacker	95052
771. Eli Celli	27707	2077. Marilyn Trybus	15202
772. Robert Verity	11710	2078. Ed Kraynak	98230
773. Nicholas D Frederick	70533	2079. chrissy hsmberger	95604
774. Diana Grob	97030	2080. Kiley Laws	97103
775. Nichole Bast	53208	2081. Mark Miller	92101
776. Takako Ishii-Kiefer	07747	2082. V Comtois	33707
777. Karen Suit	25419	2083. Valerie Charbonneau	06260
778. Laura Ray	22312	2084. Monique Verheije	10012
779. Linda Subick	60491	2085. Alex Morin	04043
780. Vicki Jaynes	63341	2086. Andy Robbins	38573
781. Andrew DeLuca	60069	2087. Sharon Hawkins	44221
782. Bill Dutton	30319	2088. Sarah Young	19050
783. michele largman	07840	2089. Dana Woods	85050
784. Jodie Larkin	66216	2090. Christopher King	89120
785. Gloria Navan	30042	2091. Karen Andre	28467
786. thomas moore	77084	2092. robert cobb	32174
787. kristin mittl	18018	2093. Edward Cotter	01876
788. J Cockerill	88061	2094. Emily Glisson	27613
789. Jim Simon	07021	2095. Charmaine Burke	71111

790. Kristen Zambo	61109	2096. Lindsey Hubbard	24201
	94531-7		
791. karen lageveen	813	2097. Michael Piraino	10314
792. John Teevan	91914	2098. Karen Boutin	02745
793. Barbara Childers	02667	2099. Carol Latchana	32801
794. Jennifer Murray	63130	2100. Stephaine Brown	75501
795. Deborah Jaworski	48813	2101. Michelle McKenna	02301
796. Adam Topper	78108	2102. Andrea DelDin	10512
797. Linda Green	43613	2103. Clare Hooson	94002
798. sherri hodes	85051	2104. K Hamelin	99577
			33138-50
799. Jysel Magana	60644	2105. Maria "Mari" Gonzalez	62
800. Glen Comuntzis	97007	2106. Shelley Kraft	93309
801. Sharon Steinbacher	17702	2107. James Desiderio	15317
802. Timothy Schacht	48214	2108. Jason Barraza	33162
803. John Chastain	30064	2109. Mary Whiteman	33598
804. Doug Flack	13601	2110. Sharon Wake	80909
805. Lillian Carlson	97071	2111. Aviayna James	70401
806. Cheryl Loman	60465	2112. Lisa Munson	28334
807. Rhianna Heaster	82729	2113. Thomas Ryan	94546
808. Kelsey Filimon	95747	2114. Ceri mcintyre	60527
809. Monica Latosky	44095	2115. Keith White	90060
810. Michael Bohm	54166	2116. Susan Pelakh	32931
811. Kyla Philips	97217	2117. whitney watters	32174
812. Rhea Tuft	84721	2118. Rose Lo	89103
813. Tom Steelman	48377	2119. julie erazo	84107
814. Trixie Geof	80403	2120. Monique Padgett	93657
815. Stacy Trevarrow	48843	2121. Glen Smith	85021
816. Christoph Frei	08044	2122. Donna Dames	28645
817. Maggie Hess	98023	2123. Riley Wolf	94025
818. Holly Clark	99352	2124. Rat Cheese	49456
819. Mike Elbourn	19107	2125. Stephane Vattuone	75223
820. Alexander Dunaev	90806	2126. Brennan Gombach	28208
821. Ten Yahul	37643	2127. Matt Kalo	17112
822. Michael Rynes	60565	2128. Sonya Huffman	35215
823. Mona Khoury	40010	2129. Urszula Kolasinski	07438
824. Cynthia Smethers	20191	2130. Tiffany Conway	75158
825. Ruthie Weller	76712	2131. Aveeda Robinson	39503
826. Francesca LaRosa	29910	2132. Willow Kasner	97370

827. Michelle Moreno	01020	2133. Russell Robinson	95928
828. Maddie Bednar	44022	2134. Randy Tashjian	37027
829. Maritza Vanasse	06470	2135. Conan O'Brien	92832
830. Joel Roemer	14617	2136. Kaitlyn Bartie	70601
831. Kevin Bannon	07461	2137. Kristine Hilbert	17202
832. Gregory Mattice	43623	2138. Sambrita Basu	94114
833. Robin McCorkhill	44105	2139. Jon Gunderson	55901
834. Deborah Watson	98513	2140. St Nick Kody Wemmer	40383
835. Dominic Fralli	33635	2141. Judith Martínez	30303
836. tom harris	08075	2142. Shelly Blackwell	85345
837. Jackie Murtha	07840	2143. McKenna Stewart	95642
838. Sheila Baugh	20191	2144. JS Fabion	92028
839. Casey Gilliland	67211	2145. Trinity Edwards	70130
840. Jeffrey Buchheit	21218	2146. Sarah Weber	47421
841. rita kovshun	80013	2147. Nicole Angelo	15071
842. M DiLeo	07748	2148. jenni german	44663
843. Judy Oates	01230	2149. laura raforth	14624
844. arlene frost	12477	2150. Embrey Harper	93643
845. C. Nichole Katz	85298	2151. RJ Browne	96094
846. Jill Marshall	37214	2152. Drew Hegedus	21234
847. Noelle Cormier	29569	2153. Hossein Habibi	10013
848. Donna Valdez	98065	2154. Kisanett Hungdji	45370
849. K Jackson	66061	2155. Stephanie Dowell	27834
850. Nadine Wallace	98407	2156. Eva Olson	85085
851. Nayda Valle	85629	2157. Laura W	32958
852. Sue Manz	80534	2158. Abby Villarreal	77065
853. Rose Halper	60629	2159. Priscila Xavier	11373
854. Nelson Molina	90620	2160. Susi Higgins	91203
855. Cynthia Wolf	92220	2161. madeline stetser	8210
856. Richard Halse	97333	2162. Fred Darsen	32714
857. Stephanie Nunez	91405	2163. Ren Darby	Atlanta, GA
			Yolo County, CA
858. devyn owens	61434	2164. Rose Puntillo	
859. Marisol Ackerman	85253	2165. Wendy Vanderwerf	97006
860. Lilly Moore	85015	2166. Barbara Gerhart	85304
861. wendy mahncke	80907	2167. Kimberly Autrey	33463
862. Tina Wilson	89048	2168. Brenda Boudreaux	70037

863. Al Mese;	07726	2169. mandy sullivan	94941
864. JoAnne Hamblin	97520	2170. Divya Nagendran	60505
865. lyn capurro	11520	2171. Ragen Serra	80127
866. Heather Woodman	32825	2172. Marc Iverson	97526
867. Dave Lillis	98638	2173. G Mcloughlin	11365
868. H S	32811	2174. Aubreay Smyth	38257
869. Debbie Calder	94544	2175. Joel Shapiro	97130
870. Ta'nya Ford	46227	2176. Lynne Boehm	11361
871. Rori Stevens	61550	2177. Kathie Raisler	97141
872. Armani Thornton	75070	2178. Ed Joyce	97103
873. Brie Nolan	30345	2179. Tim Campbell	63376
874. Leilani Mueller	85048	2180. Christine Perry	72058
875. Annabella Godbey	62959	2181. Gianna Tringali	32713
876. Lesly Derbyshire	90003	2182. Pam Speagle	40214
877. Tailor Cummins	95822	2183. William O'Brien	97005
878. Linda Fitzjarrell	98643	2184. Carrie Tassa	10022
879. Jessica Landerer	29611	2185. Estella Guerrero	43420
880. Theresa Gideon	80501	2186. collin wolff	95988
881. Penny Reynik	75033	2187. Amarjit Singh	94538
882. Sam Lux	78210	2188. Raleigh Koritz	55114
883. carol wieneke	21035	2189. Kira Rea	80212
884. Ashleigh Wiersma	91711	2190. Brenda Murry	94509
885. Austin Ward	97330	2191. Bradon White	73013
886. Addysen Platt	80247	2192. Elena Calfa	90060
887. Charmaine Henriques	39157	2193. Isabella Mounts	28314
888. Amy Wolfberg	91403	2194. Russell Gay	01801
889. Brontë Olson	97202	2195. Harry Ayres	97138
890. Erika Rikhiram	34711	2196. Nia Lyndon	04027
891. Ryan Zupancic	11370	2197. Monica Perusquia	89031
892. Lesley Taylor	28105	2198. Senoli Bolton	94102
893. Jasmine Furr	72522	2199. Sophia Mock	27856
894. Debra Ponsaa	70119	2200. David DiDonato	11211
895. Sandra Materi	82604	2201. Takayla Bryant	27834
896. Michelle Hart	98109	2202. farah rashed	32789
897. Doug Burns	34119	2203. derrick richards	71245
898. Rebecca Morse	91505	2204. June Mohler Mitman	97141
899. Charlotte Smith	24219	2205. Paige Weldy	45419
900. Sam Lynch	02081	2206. Raven Powell	33604
901. Daniella Brazelton	91730	2207. Jan Wachholz	98072

902. Liliana Vorce	63389	2208. Tania Vargas	93927
903. Jessica C	75062	2209. Mercedes dotter	19087
904. Jamila Hadade	11237	2210. Emma Eaton	12414
905. D Petrush	43016	2211. Lisa Phillips	77042
906. Monica miles	75211	2212. Robin Williams	97149
907. Andrea Garcia	60110	2213. Peyton Parrettie	01507
908. Paul Silberberg	07663	2214. William Loveday	34769
909. Kian Daniel	53213	2215. Alexander Ortega	34983
910. Suzanne Fehr	33710	2216. Sophia Edelman	30117
911. carolyn williams	97218	2217. Chelsea Mcclanahan	75110
912. Eric Fournier	02453	2218. Ella Campbell	17522
913. Sarah Thornhill	25143	2219. Marty Reza	89030
914. Dustin Murray	17747	2220. Michael Seaton jr	49938
915. Ashley Reyes	29060	2221. Ben Clutter	78703
916. Pamela Hill Yenei	57103	2222. Ellen Easum	90731
917. Megan Waddell	40299	2223. Jan Beauchamp	78028
918. Deborah Nelson	02030	2224. Rena Zaman-Zade	92026
919. Ashley Sampson	98640	2225. Marina Torres	99301
920. Jim O'Connor	97252	2226. Loren Freking	51503
921. Alyson O'Connor	97103	2227. Richard Ferry	95122
922. Jake O'Connor	97103	2228. Semhar Tekle	22191
923. Scott Wintermute	97103	2229. Suzanne Amendt	94521
924. Ramona Carlson	60631	2230. Brad Anderson	55108
925. Janice Hembree	35957	2231. Rebecca Canright	07848
926. Rachel Ferrell	43061	2232. Diane DeBiase	06492
927. Kj Gilmore	23324	2233. Kacey Renelt	80017
928. Berit Bergquist	98110	2234. Troy Danos	75234
929. Olivia Tracy	83341	2235. Lara Inglis	07850
930. Josephine Hernandez	32825	2236. Jennifer Giraldi	91377
931. Silvia Trejo	60602	2237. rudy gallardo	76040
932. Clay Aschleman	29672	2238. Mary Skirving	78748
933. Jeff Dickson	93001	2239. Regina Brooks	15209
934. Kristian Nammack	06824	2240. Jaimie Gowatsky	07011
935. Christine Hayes	11720	2241. Kim O'Leary	66204
936. Sabra Southerland	28403	2242. Heer Khan	10044
937. Kenton Fallier	32159	2243. Kathryn Gibson	60636
938. Christine Forszpaniak	34108	2244. Adam Murphy	Cobh, Ireland
939. Vanessa Schaefer	06413	2245. Patty Trabue	33570

940. Crystal Wolf	87197	2246. Rainier Meuken	03583
941. Sarah Beckford	77023	2247. Jordan Shamoun	02134
942. William Harris	37840	2248. Angelita Surmon	97214
943. Karlee Felt	54437	2249. Alia Warden	93402
944. Eric Avila	91104	2250. Callie Bergeron	60202
945. Kaysie Blersch	14075	2251. Terry Lee	80903
946. Carli Allen	97103	2252. Deborah Paul	91001
947. Annika Muyres	55414	2253. Tort Prescott	CV8 1BL
948. Jason Schneider	48150	2254. Briana Wheatley	97214
949. Alyssa Cafasso	15687	2255. Dianne Valenzuela	97103
			32653-19
950. TAMARA HULSEY	92021	2256. Gudrun D	50
951. Celiane Gagne	V1M	2257. Margaret Poyant	97203
952. Clair Toles	24541	2258. Marissa Armas	97478
953. Blase Zinck	72204	2259. Kassi Onstead	80526
954. John Nugent	60462	2260. Natasha Martines	97211
955. Briyah Lea	46368	2261. Macy McGowen	34997
956. Dick Rogers	97103	2262. Ashley Daley	76240
957. Abigail Mills	97439	2263. Jazmin Mendoza	87105
958. Lisa Cuccarese	32713	2264. Dawn Mcneal	56537
			23888-31
959. Marcus Lin	95051	2265. LynnMeta Williams	03
960. Samuel Maeder	55303	2266. Kiara Christodoro	07652
961. Ann Ornie	97103	2267. Stephanie Tenz	97214
962. Brigitte Diaz	11211	2268. Hanne Syrovatka	98101
963. Candice Jessmon	63301	2269. Chris Bock	75234
964. Tanya Spangler Parikh	94043	2270. Annette M.	92028
965. Patrick Walke	13838	2271. Olga Loor	33904
966. gracie presnell	27203	2272. Leesa McVay	25301
967. GERALDINE C. MITCHELL	20783	2273. James Winship	05701
968. Tina Damiano	31322	2274. Robert Celis	91402
969. Shari Valentine	76550	2275. Makenna Jansen	93933
970. Griffin Turner	32223	2276. Karlie Baker	40245
971. Gwenn Wood	32771	2277. Olivia Cure	68135
972. Tyler Jackson	95963	2278. Jeff Sparling	48092
973. Maria Barry	10001	2279. Atiana Marie	85029
974. Shiki Bennit	48323	2280. Julie James	30224
975. Sarah Jones	98331	2281. Stiven Barrios	33197
976. Haze Raihala	97103	2282. Melissa Lopez	90015

977. Rachel Siegel	97103	2283. matthew leder	28403
978. Autumn Buck	97266	2284. hayley wilson	V4N
979. Philipp Wickey	97103	2285. Brian Cabell	08527
980. Charlee Pine	21221	2286. Tajeer Robinson	07040
981. Pamela Schendel	53218	2287. Susan Richardson	92128
982. Matt Thorpe	83704	2288. Onica Laws	37743
983. Kayko Kameta	91010	2289. Lydia Guerra	11229
984. Michael Barker	75647	2290. Ran Strode	97110
			43213-34
985. M'lain Soley	85044	2291. Hermine Willey	09
986. Lori Siemian	12065	2292. Sharon Burnett	34711
987. Joe Liebezeit	97232	2293. Danielle Stager	43452
988. Kenneth Fincher	28081	2294. Savannah Lujan	95307
989. Iris Sullivan	97146	2295. Justin Dygert	95966
990. Kirsten kelly Kelly	97013	2296. Alejandra Paniagua	33430
991. Jamee Patrick	32073	2297. Malissa Bettencourt	94102
992. Kateyn Woodard	38053	2298. Yasmeen Khan	75093
993. Liana Norton	97220	2299. Carlos Jaramillo	29607
994. Scarlett Butler	90291	2300. Tom Austin	34953
995. Jacqueline Morgado	98502	2301. Patricia Brining	34207
996. Cody Peterson	96813	2302. Felix Liveringhouse	15725
997. Rosemarie Bilandzija	92082	2303. Sherry King	96137
998. Dania Flores	21229	2304. Stacy Cordova	04901
999. Deborah Hammond	80228	2305. Evelyn Marquez	91107
1000. Kaitlyn Youmans	90003	2306. Ivette Mendoza	79928
	N2A		
1001. Johanna Shackleton	1P8	2307. Faviola Esquivel	97702
1002. Tyrel Trainor	97365	2308. Tony Yu	95131
1003. Deljo P.joseph	680546	2309. Aurelia Crespo	78230
1004. Lisa DeMetz	14450	2310. Mellissa Carey	59901
1005. Sundos Alriffi	77845	2311. Pat A.	10016
1006. Kathleen Wilson	23454	2312. Nancy A. Holmes	97138
1007. Desiree Robles	34112	2313. Craig Cole	97136
1008. Madalyn Cox	28031	2314. Diane Johnson	97136
1009. Melissa Grabner-Hagen	97471	2315. Phyllis Thompson	97130
1010. Robert Ladd	98638	2316. Jane Anderson	97118
1011. Corinna Garcia	90066	2317. Michael Baker	97138
1012. Alicia Baldwin	35952	2318. Steven Copple	97107
1013. Sophie Jensen	84107	2319. Chris Gundersen	97116

1014. viola samson	70130	2320. Scott Fisher	97136
1015. Christine Karpinski	845588	2321. KT Friend	85087
1016. Teasha Mccallum	98506	2322. Cobalt Sjogren	97103
1017. Erin Russell	45385	2323. Faera Harper	97103
1018. Maythe Martin	33140	2324. Ben Roman	97103
1019. Jesse Estep	28743	2325. Matt Stanley	97103
1020. Jesse Eidsness	85020	2326. Jack Anderson	97118
1021. Brenda Fariole	01923	2327. Judy Coleman	97131
1022. Jade Scarbrough	92120	2328. Viviane Tallman	97131
1023. PennY Thorne	27613	2329. Deke Gundersen	97116
1024. Rachelle Rizzi	85032	2330. Beverly Goertzen	97136
1025. Nevaeh Mays	60827	2331. John Goertzen	97136
1026. Alex Jutras	02879	2332. Aurora See	97136
1027. gabby Pontello	13078	2333. Joshua Wickstrom	97103
1028. Chris Depee	97007	2334. Nichelle Wickstrom	97103
1029. Kimberly Brashler Darby	97006	2335. Ruby Owen	97103
1030. Amanda Gavin	97211	2336. Tedd Peyton	97103
1031. Dan Feeley	89107	2337. Ken Weber	97121
1032. Dana Lewis Allen	97103	2338. David Abkowitz	89523
1033. Jolet Abbott	07032	2339. Katrina Nielsen	97203
1034. Samantha Brown	33414	2340. Patricia Canich	97211
1035. Jordan Dwojewski	22602	2341. Lance Ylitalo	97216
1036. Lisa Bernard	77835	2342. Marlene Shaffer	97227
1037. AnnMarie Knight	78362	2343. Joe Collins	97034
1038. Robin Davidson	45036	2344. Willie Washington	97230
1039. Helen Salvia	27312	2345. Rebecca Nielsen	97103
1040. jung hwang	60714	2346. Michael Eberdt	97217
1041. Lou Cinda Hodge	23454	2347. Jeff Siri	97211
1042. Joshua Marquis	97103	2348. Finley Banks	10023
1043. Jessica Whittington	02169	2349. Vee Lind	97103
1044. Patrick Ellis	77406	2350. Dena Allen	97103
1045. Merisha Kroening	54956	2351. Larry Miller	97103
1046. Bradley Coffey	97110	2352. Karen Elder	97103
1047. drew m	17331	2353. Lynn Uve	97103
1048. Michael Thompson	21215	2354. Debbie Danason	97103
1049. Jennifer Schally	55082	2355. Delores Davenport	97103
1050. C Loza	78233	2356. Dave Zunkel	97121
		Rosemarie Carbonell	
1051. janice pemberton	48236	2357. Mann	97121

1052. Maria Espinoza-Ramirez	78521	2358. Julie Snyder	97103
1053. Lisa Burton	89502	2359. Debra Gerth	97103
1054. Jennifer Brown	12498	2360. Terrance Stearns	97103
1055. Meghan Murphy	60513	2361. Cass Liljenwall	97103
1056. isabelle chasse	04240	2362. Chris Leathers	97103
1057. Diana beth	46319	2363. Jennifer Andrieu	98675
1058. Conni Wireman	49068	2364. Mary Erzen	97221
1059. Emily Busenbarrick	97219	2365. Caitlin Sonn	98632
1060. Daniel Jeppesen	97217	2366. Gian Soje	98632
1061. Caroline Kahn	97220	2367. Barb Hermann	97405
1062. Joe Anderson	85335	2368. James Brennan	97405
1063. Joe Ackerman	67801	2369. Janeen Provo	97103
1064. Andrea Ackerman	80112	2370. Woody Feffer	97206
1065. Karen Stephenson	95128	2371. Abigail L. Feffer	97206
1066. Peter James	98502	2372. Trevor Tucker	97103
1067. Barbara Whyman	93001	2373. Louise Lelevich	98632
1068. Andrew Cate	28804	2374. Stephen Belluomini	98632
1069. Marco Carrera	92683	2375. Angela Barkley	97103
1070. Justin Hindo	48033	2376. Anna Weber	97103
1071. Lorrie Cancillieri	08852	2377. Samuel Liberto	97103
1072. Patrick Magann	97103	2378. Jaz Carpenter	97103
1073. sonya lujan	95422	2379. Megan Davis	97103
1074. Ron Russell	80010	2380. Joshua Kramakehke	97103
1075. jacqueline cuthbertson	28227	2381. Jennifer Goodenberger	97103
1076. Marc Walker	85712	2382. Robert Slabinski	97146
1077. Joseph Horne	85132	2383. Andrew Gurevich	97206
1078. Jan Hansen	22180	2384. Celeste Gurevich	97206
1079. Denie English	87016	2385. Madeline Ishikawa	97132
1080. Carolyn Russell	33716	2386. Andrew Eddy	97103
1081. Kris Listoe	93117	2387. Kim Warsheski	97103
1082. Ken Peterson	89504	2388. Chris Kirby	97103
1083. Susan Rodriguez	85260	2389. Jasmine Andrieu	98675
1084. Rebekah Harrison	86301	2390. Timothy Root	97103
1085. RANDAL RANAUDO	87508	2391. Jane Fitzgerald	75023
1086. A. Alberici	08028	2392. Rachel Yenter	97103
1087. Drew Scott	65202	2393. Tonia Williams	97103
1088. Kathleen Gray	14757	2394. Todd Williams	97103
1089. Stephen Douglas	97504	2395. Isabelle Williams	97239
1090. John Taft	63101	2396. Jennifer Nightengale	97103

	32806-1		
1091. Erik Melear	750	2397. David Gold	97138
1092. Angie Dixon	98236	2398. Renee Barasch	97103
1093. judith basye	92404	2399. Sophia Raterman	97103
1094. janet forman	10011	2400. Adriane Tuttle	97103
1095. Sarah Fine	97218	2401. Jim Fix	97103
1096. Jack DeMorra	21875	2402. David Wigutoff	97103
1097. Titus Polichnia	77036	2403. Katie George	97103
1098. Ashley Litton	15345	2404. Edward Hawkins	97103
1099. Mia Lee	85712	2405. Heather Vanvalkenburg	98660
1100. James Krawczyk	19966	2406. Faith Forster	98624
1101. GINGER LEE PIERCE	48842	2407. Mark Herke	97103
1102. Charles Murach	60438	2408. Sarah Woods	97103
1103. Sandy M	1606	2409. Stephanie Taggart	97103
1104. Frank Di Stefano	90041	2410. Tom Wilson	97103
1105. Cal Robinson	14526	2411. Deborah Wilson	97103
1106. Andrea Cabrera	73008	2412. John Steele	97131
1107. Jacqueline Tyler	97304	2413. Fiona Reuscher	97103
1108. Lindsey Hightower	67203	2414. Sage Reuscher	97103
1109. T Holliday	32765	2415. Kelly L. Jackson	97232
1110. Candi Ausman	94536	2416. Cindy Olson	97223
1111. Ryan Rentschler	21801	2417. Dan Deutsch	97011
1112. Erfin Hartojo	91607	2418. Paul Reid	97015
1113. Carolyn Pearson	60185	2419. Roberta M. Reid	97015
1114. Rebecca Silence	49009	2420. Cody Climer	97223
1115. Isabelle Pardew	21093	2421. Robert Babez III	97008
1116. Patrick Vick	32714	2422. Sean Munger	97223
1117. katherine Roberts	94117	2423. Deb Quirk	98103
1118. Ann Wiseman	61854	2424. Marjorie Kraemer	99354
1119. Rebecca Cardile	19711	2425. Josh Newman	97103
1120. Philip Seissian	33602	2426. Doug Mitchell	97110
1121. Sandra Watson	45208	2427. Jane Endres	97103
1122. Christina Roe	93703	2428. Annette Takko	44691
1123. Francis Lee	94066	2429. Janani Srinivasan	97214
1124. Jennifer Parten	97219	2430. Carter Goff	97227
1125. Karen Bowden	92027	2431. Tailor Martelli	98626
1126. Sonjia Weinstein	82070	2432. Gina Landsla	98115
1127. Carol Schaffer	94806	2433. Greg Sweeney	97107
1128. Kevin Petty	85041	2434. Angela Maris	97107

1129. Michael Nelson	80919	2435. Mckenzie Kincaid	98375
1130. Lisa Chadwick	48227	2436. Casey Corbit	98375
1131. Susan Snoles	34736	2437. Benoit Bernard	L57 34F
1132. Bill Plosku	10708	2438. Jolyn Montgomery	86325
1133. Susan Lantow	60586	2439. Vicki Lind	97103
1134. Michelle Urata	92845	2440. Ross Smith	97388
1135. Sean Pierce	28372	2441. Lisa Alford	97388
1136. David Gross	62274	2442. Ed Hale	97103
1137. Gail Harris	34741	2443. Richard Burke	97146
1138. Kathleen Mohning	37027	2444. Tammy Burke	97146
1139. Julie Mellors	48329	2445. Matt Jones	97103
1140. Charlotte Stephenson	72738	2446. Jennifer Jones	97103
1141. Laura Smith	32065	2447. Christina Clark	80220
1142. R Dias	89129	2448. Jim Banks	80220
1143. Rama Bharadwaj	53074	2449. Amy Krol	97058
1144. Kiki tuttle	57201	2450. Sandi Mosden	98632
1145. Maryetta Pinn	20187	2451. Kit Mosden	98632
1146. Rosemary Walker	30512	2452. Max Soleim	97048
1147. Graham Johnson	11238	2453. Taylor Kingery	97016
1148. Patricia Almazan	60602	2454. Kelley Jacquez	97016
1149. Steve Jones	34285	2455. Tiffany Marlink	97016
1150. Laura Long	60613	2456. Lindsay May	97016
1151. Christy Shorak	76476	2457. Debra Brimacombe	97056
1152. C. Allen	42134	2458. JoAnn Blodgett	97016
1153. mike disabello	33496	2459. Michelle Ramos	97016
1154. Edivaldo Dominguez	60139	2460. Eric Sides	97016
1155. Donna Bloom	55906	2461. Terry St Pierre	97016
1156. Baljit Dhillon	94015	2462. Raymond Lovasz	97016
1157. Ella Gostisha	98105	2463. Laura Polacco	91301
1158. Noelle Walsh	95758	2464. Rhian Kraft-Murphy	97016
1159. rose cykala	78745	2465. Chloe Zimmerman	98621
1160. Marva Henderson-Hartley	48168	2466. Sara Wells	97016
1161. Kirk Krebs	13787	2467. E. R. Turner	97217
1162. Patricia Jones	94707	2468. Sandra Molainer	97016
1163. Jake Stewart	99205	2469. Christina Kerksieck	97016
	Chicago,		
1164. Sandra Luna	IL	2470. Karen English	97016
1165. Reed Retherford	33761	2471. Austin Deanhardt	97206
1166. Barbara Frazer	95816	2472. Julia Deanhardt	97016

1167. Lukas Gordon	43040	2473. Becky White	97016
1168. Michael Kujawa	98103	2474. Khosro Peiravi	97016
1169. Virginie Everarts de Velp	20879	2475. Monroe Crites	98626
1170. Lynn Johnson	33904	2476. Kora Will	97048
1171. Deborah Haws	60035	2477. Silke Pierce	97048
1172. Jonelle Kop	33037	2478. Lynette Linville	97016
1173. Alberto Mocchi	33141	2479. Kim Beck	97016
1174. Louis Esposito	11209	2480. Chas Villarreal	97016
1175. Paul Cheney	95076	2481. Paul Jensen	97016
1176. Michael Buescher	76010	2482. Samuel Kent	97016
1177. Michelle LeBlanc	60647	2483. Jim Melton	97016
	93546-1		
1178. C Hougland	041	2484. Brandy McGladrey	97016
1179. Eric Dallin	39503	2485. Ashley Stanley	97051
1180. Katarzyna Nowakowska	11434	2486. Sean Williams	97051
1181. Marissa Malen	40206	2487. Julie Webster	97016
1182. Eric Lamers	91207	2488. Tejus Kimber	97016
1183. Nancy Flowers	30619	2489. Levi Kimber	97016
1184. Eugene Cooney Jr.	15218	2490. London Howell-Farley	97206
1185. Kendall Kurian	30241	2491. Jeannie Mustola	97016
1186. Kelly Katzenbarger	20877	2492. Ricky Bennett	97103
1187. Donald Gebig	11214	2493. JoDel Elam	35475
1188. Barbara Beckely	91801	2494. Brenda Carwile	98640
1189. Pat Burton	20877	2495. Janice White	35453
1190. Kali Kunkle	34243	2496. Samuel Deveraux	97103
1191. Ingrid Solorzano	46582	2497. Marianne Monson	97103
1192. Emmanuel Ramirez	92264	2498. Richard Wagman	85718
1193. Sophie Habib	60448	2499. Kerry Milligan	97130
	08077-3		
1194. Holly Gindhart	749	2500. Melody Emerick	97205
1195. Dawn Welden	94404	2501. Iris Emerick	63113
1196. gary mitchell	91207	2502. Kelly Huckestein	97103
1197. Patti Adkins	85374	2503. Kris Haefker	97103
1198. Marilyn Kopf	6035	2504. Justin Thompson	97103
	54005-0		
1199. theresa williams	053	2505. Minntah Haefker	97103
1200. G Tanz	22182	2506. Samuel Goodall	97223
1201. Lisa Howell	L4N	2507. Stephen Duckworth	97103
1202. James Sorrells	34715	2508. Beth Kandoll	97103

1203. Debra Haverkamp	66085	2509. Amy Cords	97103
1204. Graciela Iparraguirre	82414	2510. Tim Roush	97138
1205. Rozae Nichols	90046	2511. Gabby Raglione	97138
	23666-5		
1206. Michelle Dail	564	2512. Tamara Landeck	97103
1207. Renee Hansen	33756	2513. Alana Robbie	97103
1208. Nancy Heck	93454	2514. Nicholas Bowling	97103
1209. Joan Kennedy	14424	2515. Terrance Walter	97206
1210. Angela Wilkinson	78209	2516. Joshua Steger	97215
1211. Danielle Scott	30301	2517. Susan Gebhardt	98640
	33910-0		
1212. Karen Witty	218	2518. Regina Adam	98035
1213. Case Gaskill	90060	2519. Dan Fredrickson	97146
1214. Vimal Kumar	78704	2520. Tracy MacDonald	97138
1215. Tracy Holmberg	99688	2521. Amanda Langley	97138
1216. Holly Hieb	24018	2522. Sean Sawyer	97138
1217. Nancy Thompson	52501	2523. Mallory Becker	97146
1218. Anais Franco	90247	2524. Dennis Brobeck	83626
1219. Jan Shillito	49002	2525. Donna Brobeck	83626
1220. Linda Walker	97211	2526. Talya Fink	97103
1221. Jennifer Mendoza	92708	2527. Jeff Bowman	97138
1222. Eric Brooker	29492	2528. Megan Stanwood	T2E 049
1223. Anthony Wong	95687	2529. Emilie Eidus	T2E IL8
1224. patricia schnell	13007	2530. Heidi Csokas	97003
1225. William Drake	28806	2531. Lori O'Neil	97138
1226. Nick Palleroni	91335	2532. Eliza Wesemann	84321
1227. Corey Goetsch	8343	2533. Darron Major	V24 3W2
1228. David McManus	54703	2534. Shelley Bowman	97138
1229. Tina Doolen	47630	2535. Elizabeth MacDonald	97138
1230. DeAnna Hancock	85011	2536. Jeff Wiemert	97103
1231. Karen Carter	17602	2537. Graham Walker	97103
1232. Kathy Haverkamp	14456	2538. Jeannette Davis	97103
1233. Peter Orcutt	V4S	2539. Raztin Wilson	97103
1234. Alecia Bleazard	84084	2540. Dawn Johnson	97103
1235. Robert Pyle	98621	2541. Claudia Bowman	97103
1236. Gary Zimmermann	85208	2542. Jasmine Walker	97103
1237. Patricia McNabb	98664	2543. Lynne Day	97103
1238. karen williams	03220	2544. Ryan Kennedy	97103
1239. Megan Curtis	49503	2545. Robert Goldberg	97103

1240. adlee beane	43230	2546. Jamie Boyd	97103
1241. Katelyn Burgess	48725	2547. Marilyn Dreher-Loving	99663
1242. Hiedi Tan	37934	2548. Lisa Morley	97103
1243. Jodi Hanson	60005	2549. Jennifer Tompkins	97103
1244. Javier Reza	95062	2550. David Tompkins	97103
1245. Tami Phelps	96001	2551. Becky Graham	97138
1246. Susan Weirich	60034	2552. Rhonda Piasecki	97103
1247. Leslie Berlin	91403	2553. Maryellen Hockensmith	97138
1248. Helaina Arnold-Decyk	19968	2554. Michael McCulloch	97138
1249. Krista Schmid	08055	2555. Sequoia Antrim	97121
1250. Kirsten Bilderaya	80601	2556. Kayley Hatt	97121
1251. Melissa Katterson	15046	2557. Leona Sisson	97138
1252. Judy Dughman	80107	2558. Thelma Ivy	97138
1253. Elaine Nazzaro	02152	2559. Marcus Sorlie	98542
1254. Alicia Cuccia	60448	2560. Pamela Schwenzer	97138
1255. Christian Gonzalez	60139	2561. T Schwenzer	97138
1256. Janene Ezell	37027	2562. Tracy Lincoln	97138
1257. Joan Dahlquist	60614	2563. Alysa Adams	98611
1258. Deb Howard	04983	2564. Hope Adams	98042
1259. Ann Tedeschi	11953	2565. Colette Adams	98168
1260. felicia peters	94954	2566. Cristin Shay	97146
1261. Nicholas Frederick	70533	2567. Taryn Shay	97146
1262. Kelly Rodriguez	01040	2568. Mary Kemhus	97138
1263. Mary O'Neill	33432	2569. Kenna Fenton	98059
1264. Andrew Kingery	36272	2570. Verna Metz	97138
1265. Sue Morrison	V1W	2571. DeAnna VanDuzer	97138
1266. Colette Breton	06457	2572. Josie McCall	97138
1267. Jennifer Crump	28619	2573. Mia Wright	97138
1268. Shawna Crabill	91324	2574. Katherine John	97138
1269. Matt Brown	97232	2575. Kathleen Ruiz	97138
1270. Lauren Fancher	76182	2576. Janet Becken	97138
1271. Ellen G	53089	2577. Debra Barrett	98640
1272. Elizabeth Binstead	19072	2578. Judy Loney	97212
1273. Gayle Mesco	91324	2579. Robin Loney	97045
1274. Sandra Lazzinnaro	11580	2580. Samuel Young	97103
1275. lisa jefko	61111	2581. Joshua Timmins	97003
1276. Craig Kadane	11702	2582. Judd Eisenberg	97146
1277. Jason R	13357	2583. Heather Eisenberg	97146
1278. Sophia Alaby	19067	2584. Stephen Marshall	29642

1279. K.A. Hughes	97103	2585. Nan Porterfield	98626
1280. Laura Clayton	60645	2586. Melissa Marcotte	97701
1281. Kevin Sampson	73072	2587. Peter West	97211
1282. Lori Sandham	83706	2588. Carolyn Wexler	97138
1283. Claudia Beck	80233	2589. Eldon Wexler	97138
1284. Victoria Bush	38462	2590. Terrisse Hovis	97138
1285. Anne Sus	60634	2591. Kathleen Steeple	97121
1286. Aaron Brienzo	85302	2592. Sonia K. Bringhurst	97103
1287. Hannha Langford	363839	2593. Sally A. Montano	97103
1288. Milly Fiallos	70810	2594. Serena Lonewolf	97103
1289. Birgitta Jackson	77095	2595. Heidi Schleiss	97103
1290. Rebecca Whitmarsh	13732	2596. Todd G. Bringhurst	97103
1291. Stadcie stad	92841	2597. Emily Barber	97103
1292. Kaylin Ginger	68134	2598. Riki Unterseher	97404
1293. Dana Simone	07642	2599. BraeAnn Bartlett	97138
1294. Carmen Denison	49417	2600. Susan Yost	98665
1295. Shannon Marie Osborne	13903	2601. J. Rachel Jacobson	97103
1296. Emma Ecke	07111	2602. Nancy Sweet	97103
1297. Bethanne Alderman	46184	2603. Amanda Zaharie	97103
1298. Libby Taylor	95128	2604. Spenser Zaharie	97103
1299. Shane Chabina	70711	2605. Alison Kroes	V5K1E2
1300. Lolly Bivens	30306	2606. Nancy Hawk	85262
1301. Tisha Taylor	27405	2607. Rick Freedman	85262
1302. Bristol Tompkins	79745	2608. J. Sarah Nebeker	97138
1303. Laurie Sippel	63361	2609. Pat Harrison	97103
1304. Victoria Horne	29307	2610. Scott Massey	85024
1305. lila fad	19143	2611. Tammy Jackson	85024
1306. Brooke Sabo	77536		

Sept. 2024

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

My name is Avi Goldshmidt and I work for Wild Salmon Center as the community engagement coordinator on the North Coast. Thank you for the opportunity to provide public comment on state forest management issues. I would also like to thank members of the board for finalizing the Habitat Conservation Plan, which will give a fighting chance for endangered species to recover in our state forests.

We at Wild Salmon Center have collected about 7,000 signatures from people requesting greater protections of our state forests. These signatures have already been submitted to the record for your consideration. More recently, I have gathered an additional 449 signatures on the North Coast since July 21st, which I am submitting to the record as well. The people who have signed their name support a strong and permanent adoption of the HCP without any further delay.

Many Oregonians I have spoken to see ecological forest management as the only sustainable option for our state forests in a time of climate change and after a long history of overharvesting in our forests. Many of the visitors I have spoken to have made it clear that lush, old forests are one of the main reasons why they travel here to Oregon from all over the world. The recreation economy provides over half a billion dollars a year to the North Coast, including tens of millions in state and local taxes.

The 449 signatures that I have collected and the thousands altogether match the polling done by the Oregon Values and Beliefs Center in 2022, which reported nearly 90% of respondents saying that fish and wildlife habitat, cold clean water and safe drinking water were important values for state forests. 80% ranked recreation as a top value.

Please continue to listen to the people of Oregon who are asking you to manage our public forests through a lens of ecological stewardship. Managing our forests with the environment as the top priority would yield positive economic benefits through support of the booming tourism, fishing, and recreation economies. It would provide a more ecologically sustainable supply of logs for local mills and support healthy and mature forests for us all.

Thank you for keeping the values of Oregonians in your mind as you decide on how to manage our state forests.

Respectfully,
Avi Goldshmidt
Outreach Coordinator
Oregon North Coast
Wild Salmon Center



STAND TALL | OREGON

Sept. 2024

Dear Governor Kotek, Chair Kelly, Members of the Board of Forestry, and Legislators,

We, the undersigned, are writing to applaud efforts by the Board of Forestry to begin restoring balance to our state forests by finalizing the Habitat Conservation Plan (HCP). The HCP will improve protection for salmon streams, threatened wildlife, water quality and recreation, while providing a sustainable supply of logs for local mills. It will also improve carbon storage and absorption to help combat the effects of climate change.

We urge you to move forward with permanent adoption of the HCP without further delay.

Signed,

Jim Banks	80220
Richard Burke	97146
Andrew Eddy	97103
Jennifer Jones	97103
Matt Jones	97103
Samuel Liberto	97103
Vicki Lind	97103
Angela Maris	97107
Jolyn Montgomery	86325
Greg Sweeney	97107
Anna Weber	97103
Nichelle Wickstrom	97103
Joshua Wickstrom	97103
Lisa Alford	97388
Tammy Burke	97146
Christina Clark	80220
Casey Corbit	98375
Carter Goff	97227
Ed Hale	97103
Mckenzie Kincaid	98375



STAND TALL | OREGON

Amy Krol	97058
Gina Landsla	98115
Tailor Martelli	98626
Sandi Mosden	98632
Kit Mosden	98632
Ross Smith	97388
Janani Srinivasan	97214
Annette Takko	44691
Kim Beck	97016
JoAnn Blodgett	97016
Amy Davies	97103
Julia Deanhardt	97016
London Howell-Farley	97206
Kelley Jacquez	97016
Paul Jensen	97016
Christina Kerksieck	97016
Levi Kimber	97016
Tejus Kimber	97016
Farrah King	97103
Rhian Kraft-Murphy	97016
Lynette Linville	97016
Jim Melton	97016
Khosro Peiravi	97016
Laura Polacco	91301
Michelle Ramos	97016
Eric Sides	97016
Ashley Stanley	97051
E. R. Turner	97217
Chas Villarreal	97016
Sara Wells	97016
Becky White	97016
Sean Williams	97051

STAND TALL | OREGON



Debra Brimacombe	97056
Monroe Crites	98626
Austin Deanhardt	97206
Karen English	97016
Samuel Kent	97016
Taylor Kingery	97016
Raymond Lovasz	97016
Tiffany Marlink	97016
Lindsay May	97016
Brandy McGladrey	97016
Sandra Molainer	97016
Silke Pierce	97048
Max Soleim	97048
Terry St Pierre	97016
Julie Webster	97016
Kora Will	97048
Chloe Zimmerman	98621
Margie Arata	98683
Cynthia Arnow	85224
Gary Hibdon	85224
Erica Hilands	97138
Megan Hornbeck	97138
Laurie Kidd	98021
Augustus Manhire	97146
Zoe Manhire	97146
Edwin Sterling	97138
Cathy Turner	97013
Frederick Vinson	97355
Angela Whitlock	97138
Jeff Bernhardt	97138
Bruce Carlson	98391
Julie Corbin	98117



STAND TALL | OREGON

Jake Douglas	57110
Jessie Douglas	57710
Misty Douglas	98683
Jim Dyke	78363
Sam Garrison	97102
Ali Hornbeck	97138
Daniel Hull	98902
Sharon Johnson	97138
Kristine Levinshore	28277
Lisa Miller	98572
Edan Miller	97138
Robert Reuter	97138
Cassandra Sagan	97219
Ana Sarish	97086
Greg Sarish	97086
Susanne Ulvi	97138
Diana Velasquez	97138
Jessica Villegas	98928
Marti Waje	97138
Mary Webster	98572
C Weckler	98290
Ken Williams	78363
Andrea Wolfe	97136
Regina Adam	98035
Ricky Bennett	97103
Pat Bonsant	4092
Nicholas Bowling	97103
Jaz Carpenter	97103
Brenda Carwile	98640
Amy Cords	97103
Jenn Crockett	97103
Samuel Deveraux	97103



STAND TALL | OREGON

Susan Gebhardt	98640
Kris Haefker	97103
Minntah Haefker	97103
Suzanne Kaiser	85718
Beth Kandoll	97103
Kerry Milligan	97130
Marianne Monson	97103
Gabby Raglione	97138
Alana Robbie	97103
Tim Roush	97138
Cobalt Sjogren	97103
Joshua Steger	97215
Justin Thompson	97103
Richard Wagman	85718
Terrance Walter	97206
Eric Wheeler	97103
Sayra Adams	97103
Stephen Duckworth	97103
JoDel Elam	35475
Iris Emerick	63113
Melody Emerick	97205
Samuel Goodall	97223
Kelly Huckestein	97103
Margery Jette	97138
Tamara Landeck	97103
Paula Shreffer	60543
Janice White	35453
Rachael Anderson	97146
Mallory Becker	97146
Jeff Bowman	97138
Donna Brobeck	83626
Dennis Brobeck	83626



STAND TALL | OREGON

Heidi Csokas	97003
Talya Fink	97103
Christina Hopkins	97146
Ava Lambert	97138
Amanda Langley	97138
Tracy MacDonald	97138
Lori O'Neil	97138
Sean Sawyer	97138
Brenda Weisendanger	97103
Rob Weisendanger	97103
Lisa Bell	97138
Shelley Bowman	97138
Jamie Brown	97138
Molly Jaden	97110
Elizabeth MacDonald	97138
Horus Orrend	97016
Michelle Ryan	95688
Kevin Ryan	95688
Linda Smith	97103
Kai Stinson	97138
Anne Taillard	97110
Bill Thomas	97103
Wendy Thomason	97138
Hugh Thomason	97138
Eliza Wesemann	84321
Claudia Bowman	97103
Jamie Boyd	97103
Jeannette Davis	97103
Lynne Day	97103
Marilyn Dreher-Loving	99663
Robert Goldberg	97103
Becky Graham	97138



STAND TALL | OREGON

Ryan Kennedy	97103
Denise Louie	97103
Lisa Morley	97103
Rhonda Piasecki	97103
Len Sherp	97103
David Tompkins	97103
Jennifer Tompkins	97103
Jasmine Walker	97103
Lesli Dalaba	97103
Dawn Johnson	97103
Graham Walker	97103
Jeff Wiemert	97103
Lynnell Wiemert	97103
Raztin Wilson	97103
Susan Banyas	97103
Margaret Eason	97016
Brandon Fazzone	97526
Kate Fox	97016
Anne Fudyma	97103
Paulette Graham	98632
Anne Green	97103
Billie Hoffman	97103
Lauren Lovitte	97051
Lauren Mallett	97146
Roy Mccoskey	97048
Rosemary Scandale	97048
Paul Seamons	97054
Ahsha Staiger	97103
David Sweet	97048
Elizabeth Tucker	97016
Kenneth Tucker	97016
Dee Vadnais	97054



STAND TALL | OREGON

Tonia Wagner	97016
Victoria Aveiro	97103
Marsha Blum	97016
Lisa Braaten	97051
Cathy Cook	97056
Marvin Cook	97056
Brett Dobson	98607
Jodi Dobson	98607
Phillip Eason	97016
Americus Figueredo	97048
Jared Haddock	97016
Joseph Jayuss	97016
Joshua Lovitte	97051
Cynthia Mccoskey	97048
Jessica Minium	97016
Tina Powers	98632
Robin Richardson	97016
Mary Anne Sullivan	97016
Jessica W	98626
Daniel Payne	97111
Lawson Payne	97111
Travis Rowland	97138
Troy Styx	85530
Maryellen Hockensmith	97138
Leona Sisson	97138
Michaela Sorlie	98542
T Schwenzer	97138
Alysa Adams	98611
Colette Adams	98168
Todd Egan	98391
Cristin Shay	97146



STAND TALL | OREGON

Taryn Shay	97146
Kenna Fenton	98059
Kathleen Ruiz	97138
Janet Becken	97138
Judy Loney	97212
Robin Loney	97045
Samuel Young	97103
Sequoia Antrim	97121
Kayley Hatt	97121
Charles Mattocks	97138
Cynthia Denove	92109
Thelma Ivy	97138
Marcus Sorlie	98542
Pamela Schwenzer	97138
Tracy Lincoln	97138
Wendy Lincoln	97138
Hope Adams	98042
Janice Turner	48135
Verna Metz	97138
DeAnna VanDuzer	97138
Josie McCall	97138
Mia Wright	97138
Katherine John	97138
Debra Barrett	98640
Joshua Timmins	97003
Stephen Marshall	29642
Brenda Nuding	97068
Joyce Senior	97103
Peter West	97211
Roy McGill	97206
Erick Mendez	97138
Emily Murray	97146



STAND TALL | OREGON

Liv Vasquez	97138
Michelle Kraushaar	97138
Jocelyn Millirem	97138
Otter Hovis	97138
Judd Eisenberg	97146
Heather Eisenberg	97146
Terry Williams	97138
Nan Porterfield	98626
Nancy Lochrie	97138
Melissa Marcotte	97701
Kaylee Ellis	97138
Jeanna Deitz	98036
E. Louise Tippens	97211
Carolyn Wexler	97138
Eldon Wexler	97138
Terrisse Hovis	97138
Diane Johnson	97136
Phyllis Thompson	97130
Jane Anderson	97118
Denise Monaghan	97103
Pat McGinnis	97131
James Laskey	97136
Jan Layne	97130
Ann Laskey	97136
Daniel Howlett	97136
Lyndsey Matteson	97136
Gregory Sweeney	97107
J. Sarah Nebeker	97138
Pat Harrison	97103
Tammy Jackson	85024
Susan Yost	98865
Nancy Sweet	97103



STAND TALL | OREGON

Ron Sweet	97103
Spenser Zaharie	97103
Alison Kroes	V5K1E2
Hilary Kroes	N3A IC5
Jacob Bansmer	97103
Riki Unterseher	97404
Canda Lodge	97404
Emily Barber	97103
BraeAnn Barleett	97138
Curtis Whitmore	97138
Sarah Cox	97103
Anna Kaufman	97103
BraeAnn Bartlett	97138
Elijah Contreras	97138
Jana Price	83669
Derrick Laws	97138
Cristina Ramsy	33325
Terry Ramsy	33325
Kyle Thomas	99223
Hannah Queen	99223
Heather Queen	99203
Ken Zittenfield	97138
Ray Chasteen	97222
Elizabeth Schaedler	97136
Vikki Behrens	97136
Bonnie McKinlay	97219
James Plunkett	97219
Richard Felley	97131
Joanne Smith-Davis	97267
Bruce Davis	97267
MJ Basti	97141
John Walsh	97141



STAND TALL | OREGON

Sheila Walsh	80526
Jennifer Johnson	97330
Becky Legrande	97330
Jenny Francis	97141
C. M. Hersh	97213
Edna Holt	97141
Letha Blair	97141
Kaylan Smith	97141
Bruce Bashel	V25-8Z3
Suzanne Mahoney	97141
Rebecca Clifton	97141
Rick Kimball	97317
Renae DeNoble	97141
Bandar Alneami	97229
Laurell Hoffman	97141
Cindy Buchter	97141
Diane Ruelandt	97148
Lisa Herbek	97209
Raelyn Garland	97007
Dianne Garland	97007
Anna Springer	97141
Stephen Springer	97141
D. Michael Dill	97112
Margaret Ogle	97149
Trella Reyes	97136
Aristed Reyes	97136
Haily Avalos	97123
Janet Maple	97038
Lynne Terrell	97141
Kirk H. Terrell	97141
Dez Crawford	97211
Bruce Bonnell	97211



STAND TALL | OREGON

Dr. Grant G. Mitman	97141
June Mohler Mitman	97141
James Dishongh	97005
Marla Dishongh	97005
Matthew Forsyth	97219
Scott Raymond	97138
Tom Rado	97102
Frank Berg	97138
Barbara Lewton	97138
Jeff Mo	97138
Travis Raver	97138
Rebecca Folsom	96021
Casady Joiner	98201
Cindee Oback	97138
Alex Vick	84054
Ian Dutton	2323 (AUS)
Kellen Mraz	98020
Mark Mraz	98020
Stepha Krovov	97138
Barbara Cullum	97138
Mark Moffenbier	97138
Jackie Moffenbier	97138
Avi Goldshmidt	97103
Michael Knighten	97102
Cindy Martin-Shaw	97401
Aurora See	97136
Cheryl Lowe	59901
Angela Young	97136
Cynthia Sinn	97136
Danae Fredricksen	98661
Patricia Kenyon	85365
Catherine Armstrong	99362



STAND TALL | OREGON

Taffy Hunter	99016
Christopher Blake	99016
Timothy Blake	99016
Emilija Blake	99016
Mango Pacheco	98664
Karen Campbell	97708
Ila Parnell	97141
Elizabeth Church	97203
Erin Hurley	98122
David Spring	97702
Robin Spring	97702
Teresa Enslin	98407
Irene Ralston	94580
Mark Shepherd	30506
Linda Wells	97103
Cheryl Conway	97103
Mark Covell	97103
Robert M. Paulmenn	97103
Melissa Henige	97103
Lindsay Bones	97103
Michael Callen	97146
Andy Davis	97103
Judith Huck	97103
Florence Sage	97103
Nancy Holmes	97138
Carla Cole	97103
Blaine Verley	97103
Carol Newman	97103
Hope Harris	97103
Isa Haverlan	97103
Cliff Taylor	97103
Aislinn Kerchaert	97103

STAND TALL | OREGON



Susana Gladwin	97138
Lynda Chick	97131
Paul Killonin	97138
Taylor Lane	97023
Jeanne Nordmark	97138
Cynthia Field	97103
Eva Kirk	97138
Maureen Judge-Morris	97138
Dave Morris	97138
Paul Burton	23314
Sarah Thorn	63123
Debbie Plawner	97225
Marilyn M Jordan	97211
Marilyn N Jordan	98672



September 10, 2024

Oregon Board of Forestry
2600 State Street
Salem, Oregon 97310

Re: Comments re: Forest Management Plan & Climate Change and Carbon Plan

Dear Chair Kelly and Members of the Board of Forestry:

In November 2021, this Board unanimously adopted a Climate Change and Carbon Plan (CCCP) for Oregon's Forests. This was an exciting moment, as the Board was in the midst of several planning processes that would be influenced by the goals and directives included in the CCCP. However, the implementation of the CCCP has not matched the urgency of the climate crisis that led to its existence.

For example, exactly one year ago I came to this Board and testified about the importance of incorporating the Climate Change and Carbon Plan into the draft Forest Management Plan (FMP) for western state forests. In short, the CCCP is very explicit about the importance of state forests to achieving the goals of the CCCP and directs ODF to lead by example and demonstrate climate-smart forest management on State Forests to achieve Greatest Permanent Value. The CCCP further directs that climate smart forestry will be incorporated into the revision of the FMP. *CCCP at 30*. The final FMP "**will** be implemented to adapt to climate change and mitigate its impacts on the management of state forest lands. The FMP **will** also contribute to climate change mitigation and sequester carbon" (Board of Forestry approved guiding principle 11 for FMP revision). *CCCP at 20 (emphasis added)*.

The Supporting Actions of the CCCP are to be incorporated into agency planning, which includes an entire suite of recommendations for the Forest Management Plan and State Forests Carbon Storage. Last year my testimony laid out the whole list, which starts on page 30 of the CCCP, and noted how the draft FMP failed to incorporate any of the provisions.

A year later, the draft FMP still lacks any specificity regarding the CCCP's supporting actions. Today, I want to draw your attention to two key actions that the Board should take to ensure that the goals of the CCCP are at least partially realized in the FMP. As laid out in the CCCP, the FMP should:

- 1) Identify areas particularly susceptible to the deleterious effects of climate change and work to conserve them. This includes climate-sensitive habitats, areas of high conservation value, and areas of cultural significance that may become threatened by climate change. This should be done with input from tribal and community-based organizations; and
- 2) Identify areas that have high carbon storage potential, especially for those that can provide benefits for threatened and endangered species habitat, water quality, and educational and recreation opportunities for Oregonians. Establish priorities for these areas that include long-term carbon storage. *CCCP at 30-31*.

These are clear, achievable, existing directions for the agency to follow as it creates the new Forest Management Plan. To the best of my knowledge, ODF has not identified such areas in the draft FMP.

There are two steps that ODF should take to implement the actions included in the CCCP. First, initiate the process to identify lands that are particularly susceptible to the deleterious effects of climate change and/or areas that have high carbon storage potential. There is still plenty of time in the FMP process for ODF to undertake this identification process.

Second, once identified, initiate the process of changing the classification of the priority land to "High Value Conservation Areas" under the Forest Land Management Classification System (FLMCS). As you know, the FLMCS is the zoning code for the state forests - the management emphasis identifies the extent to which a parcel of land can be managed for a variety of forest resources. The FLMCS framework directs the State Forester to place all state forest land within one of four land management classifications and manage according to the priorities for that classification.

High Value Conservation Areas are lands for which a forest management plan or habitat conservation plan has identified areas in the landscape which need to be managed in order to maintain, enhance, or restore important conservation values and one or more of the following: a legal or contractual constraint dominates the management of the lands and directs the management of forest resources; lands are committed to a specific conservation value and management activities are limited to those that are compatible with achieving goals for the specific conservation value. OAR 629-035-0055(d).

In addition, other lands may be classified as High Value Conservation Areas, where more specific, small-scale, or time-limited plans developed by the State Forester to implement forest management plans call for a level of resource protection that directs the management of forest resources. OAR 629-035-0055(d)(A). The designation of High Value Conservation Areas may be a time-bound designation and does not necessarily remove land from timber production permanently.

As it stands, the draft FMP barely mentions the CCCP and certainly does not include the specific, clear direction that the climate plan lays out for state forest management. Adoption of the Habitat Conservation Plan for western state forests is not a stand in for complying with the specific directives of the CCCP as it is not clear that the HCAs and RCAs correlate to the same areas prioritized for protection under the CCCP. At the very least, do the mapping project to see where there is overlap and where additional measures are needed to implement the CCCP.

By initiating a project to identify priority areas for climate mitigation and carbon storage, and then directing the State Forester to begin the process to redesignate the lands as High Conservation Value Areas, the Board would finally act on both the direction of the CCCP and the climate crisis that is facing all of us - including Oregon's forests!

Please do not miss this huge opportunity for ODF to "lead by example and demonstrate climate-smart forest management on State Forests to achieve Greatest Permanent Value." *CCCP at 20.*

Thanks for your consideration,

A handwritten signature in black ink, appearing to read "Brenna Bell", written over a horizontal line.

Brenna Bell, Forest Climate Manager
350PDX



SIERRA CLUB

OREGON CHAPTER

September 4, 2024

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

For the record, my name is Carol Valentine. I'm testifying on behalf of the Oregon Chapter Sierra Club. Exactly two years ago, our Forest Team submitted a [comment](#) urging the Board to take concrete steps toward shifting management of our state forests to a more ecologically-based model of forestry. Social license for clearcutting and broadcast spraying of toxic herbicides, especially by helicopter, on our publicly-owned state forests has dwindled. More and more, members of the public want management of the lands owned by all Oregonians to prioritize protection of drinking water, climate, and wildlife habitat. A model of forest management that recognizes forests as complex "ecosystems with diverse biota, complex structure, and multiple functions, and not simply collections of trees valuable primarily for production of wood"—to quote Franklin, Johnson, and Johnson—can allow for some production of forest products without the harm to microclimates, soil, water, and aquatic species imposed by the intensive industrial forestry practices of clearcutting and herbicide spraying.

In ODF's 2025-27 budget request, Climate Leadership was listed as a *top priority. To that end, while the **first priority for managing the Habitat Conservation Areas and Riparian Conservation Areas** is to benefit endangered species, the next highest priority should be to manage these areas as carbon reserves. **Management plans should also retain mature stands of 80 years or older adjacent to HCA boundaries** as carbon banks and "stay ahead" reserves for the HCP. This would be an important step toward implementing the Climate Plan and help ensure that the HCP is successful over time.



SIERRA CLUB

OREGON CHAPTER

* Priority: **Climate leadership** The division's management of state forestlands protects key aquatic and terrestrial refugia, creates and maintains diversity in regenerated forests, and sequesters and stores carbon both in the forest and in harvested wood products.

COLLINS Eleni * ODF

From: Cheryl Johnson <cheryl067@outlook.com>
Sent: Wednesday, September 18, 2024 9:41 AM
To: FORESTRY Boardof * ODF; KELLY Jim * ODF; AGPAOA Liz * ODF; CURTISS Heath * ODF; DEUMLING Ben * ODF; JUSTICE Joe * ODF; MCCOMB Brenda * ODF; VANDYK Bob * ODF
Cc: HUNTINGTON Geoff * GOV; MUKUMOTO Cal T * ODF
Subject: Clatsop Co Field Trip
Categories: Testimony-Board-Mtg.

Some people who received this message don't often get email from cheryl067@outlook.com. [Learn why this is important](#)

Jim Kelly, Chair, Oregon Board of Forestry

Members of Oregon Board of Forestry

I am a 50-year resident of rural Clatsop County. My husband and I have raised children and now enjoy grandchildren here. We share a back property line with ODF. We have friends and neighbors who make their living in the timber industry. We have had a positive working relationship with the Astoria Dist of ODF and good communications with Brad Catton.

I write to you today in response to the September 4th meeting of the BOF, which I listened to in the recording. There was repeated reference to “confusion” felt in Clatsop Co. caused by board member Bob Van Dyk’s recent field trip made to two ODF sites proposed for clear-cut.

Unlike the two Clatsop County Commissioners who spoke at the Sept 4th meeting, I actually attended the Davis Ridge site visit and walked the private property of Terry Henry. Davis Ridge is our neighborhood and we pass the proposed cut site daily going to and from our home.

There was no “confusion” on the NEED for this visit or the PURPOSE for this visit.

The landowners and residents of both Mothball Hill and Davis Ridge proposed cut sites had **repeatedly** asked to meet with Astoria ODF to voice their concerns, ask questions and get information. They were **repeatedly** told Astoria ODF would NOT meet with them until AFTER July 1. This is the date when the list of harvest sites would be finalized.

Landowners and Clatsop County residents, myself included, attended **multiple** County Commissioner meetings. During public comment, we asked our elected representatives to communicate with Astoria Department of Forestry to encourage or support communication with adjacent landowners. Despite our requests Clatsop County Commissioners never publicly discussed this issue, which had been on the front page of the Daily Astorian. Our elected representatives ignored our pleas and took no action.

Bob Van Dyk was **invited and was willing** to meet with residents and tour the proposed sites. The field trip was scheduled for June 27th. We were surprised and I was personally pleased, that not 1 but 3 reps from Astoria ODF also showed up and took time to participate in all the Mothball Ridge tour and most of the Davis Ridge tour. I felt it was a positive and productive tour.

As a participant in the tour, I felt Van Dyk was quite clear in explaining to us his only role was to listen and gather information – especially concerning process and the lack of communication with our local ODF office.

I regret we did not video or audio record this field trip. I personally attended the final part of Davis Ridge, which was on Terry Henry's land. As we were standing in the forest, near Terry's water source, Van Dyk clearly explained to us that he could not/would not interfere with Astoria Dist. Annual Operating Plans. It is unfortunate that you could not see or hear for yourselves Van Dyk actually referring to the Statute that clearly forbids BOF interference!!

"Confusion" has been expressed by folks who did not attend and/or chose to ignore the repeated requests of citizens to meet, ask questions and get information about proposed clearcuts in our neighborhoods and our backyards.

Thank you to Commissioner Van Dyk for listening and caring!

RESPECTFULLY,

Cheryl Johnson

44183 Peterson Lane

Astoria, OR 97103

The Planet's Greatest Forests

Oregon's Coastal Forests

Chair Kelley and members of the Board of Forestry, thank you for allowing me time for a brief comment. For the record, I'm Chuck Willer, Executive Director of the Corvallis based Coast Range Association.

During the past four months, my work on federal forest plan amendments has brought to my attention new facts. The Siuslaw National Forest's growth over the past 35 years, the time of my forest conservation career, has been much larger than I previously understood. That **growth is a game changer due to the volume of atmospheric carbon sequestered**.

In the face of a dangerously warming climate, the need to **reverse** atmospheric carbon buildup, and the startling fact of Oregon's coastal carbon storage potential – I've changed my mind about the best management for all coastal forests.

I believe we need to manage forests from the Coast Range crest to the Pacific shoreline for carbon sequestration to combat global warming. Unlike current management that sees carbon sequestration as one among many issues, carbon sequestration is THE issue – all others are secondary.

On a per-acre basis, we now know that the Siuslaw National Forest is the number one carbon storing national forest in the country. I repeat – it's first out of 154 national forests! And it is still a young forest compared to its maximum carbon storage age of 400 years.

If the Siuslaw is first in class for federal land's carbon storage, then the carbon storage potential of Oregon's north coast state forests must be as great if not greater. Yet, in Oregon's political chambers and policy circles we hear next to nothing about such a status. Like the Siuslaw when climate is addressed, it's just one issue on a list of issues.

The debate about the **State Forest Management Plan** pivots around how much income local governments will receive. I now believe state forest management must be the outcome of appropriations from the state Legislature.

Oregon's coast has the potential to pull more carbon dioxide from the air than any other forest location on the planet. It's time to look up and see the forest's carbon potential and appreciate its required purpose during this time of emergency.

Thank you.

From: [Brown, Dan](#)
To: [FORESTRY Boardof * ODF](#)
Cc: [KELLY Jim * ODF](#); [McComb, Brenda C](#)
Subject: Public Testimony for September 4th Board meeting
Date: Friday, August 30, 2024 1:50:36 PM
Attachments: [EPA-ODEO-ODFW-comments-on-Post-disturbance-harvest-rule.pdf](#)

Some people who received this message don't often get email from brown.dan@epa.gov. [Learn why this is important](#)

Chair Kelly, Vice-Chair McComb, and Board Members,
EPA understands testimony is not being accepted for items for which the public comment period has already closed. However, EPA and other agency's provided comment during the Post-Disturbance Harvest Rulemaking and EPA does not believe the ODF staff report adequately addresses the concerns raised.

EPA understands the Post-Disturbance Harvest Alternative is based on a negotiation of the Private Forest Accord authors and is more protective than the existing and outdated rules for Alternative Vegetation Retention Prescriptions (629-643-0300). EPA's September 30, 2022, letter to ODF recommended withdrawal of that existing and outdated rule as part of the Forest Practices Act Rulemaking. At that time EPA noted the inconsistencies between the outdated rule and the increased resource protections provided by the PFA rules. In February 2024, the Board determined degradation of resources is likely to occur if forest practices continue under the existing and outdated rules for Alternative Vegetation Retention Prescriptions (629-643-0300). EPA recommends the Board considered repealing the existing rule as soon as practicable.

As noted in EPA's April 30, 2024, comments on the Proposed Rulemaking for the Post-Disturbance Harvest Rule, we believe the Water Protection Rules at 629-643-0000(65) establish important context for the rulemaking and the Board's decision. This rule paragraph states the following:

"(65) In many cases, the operator may achieve the desired future condition for streams by applying the standard vegetation retention and small forestland owner minimum option prescriptions as described in OAR 629-643-0100, 629-643-0105, 629-643-0120, 629-643-0125, 629-643-0130, 629-643-0135, 629-643-0141, 629-643-0142, 629-643-0143, and 629-643-0145. In other cases, the existing streamside vegetation may not be able to develop into the desired future condition in a timely manner. In these cases, the operator may apply an alternative vegetation retention prescription as described in OAR 629-643-0300 or develop a site-specific vegetation retention prescription as described in OAR 629-643-0400. For the purposes of these water protection rules, "in a timely manner" means that the trees within the riparian management area will substantially move towards the desired future condition more quickly than if the trees are left untreated."

This rule language implies any post-disturbance harvest alternative should be compared to the standard vegetation retention. If using the standard vegetation retention does not achieve the desired condition in a timely manner, then an alternative may be used. And in developing and or applying the alternative, an evaluation would need to determine the alternative treatment would make faster progress toward the desired condition as compared to the standard vegetation

retention treatment.

Several agencies provided comment during the rulemaking (see attached) sharing scientific evidence that the standard vegetation retention treatment will likely achieve desired future conditions more quickly than the Proposed Post-Disturbance Harvest Alternative. The ODF Staff report briefly summarizes these comments but does not adequately address the scientifically backed concerns in a manner that supports Board approval of this alternative.

EPA appreciates the work of the Board, ODF and Private Forest Accord participants in developing and approving forest practices that support the harvest of timber while reducing impacts to natural resources, protected species and, importantly, helping Oregon meet its obligations under the Clean Water Act. As the Clean Water Act oversight agency, we encourage the Board to engage with EPA as you fulfill your obligation to establish forest practice rules insuring pollutants from forest operations do not impair the achievement and maintenance of water quality standards, as required by the Oregon Forest Practices Act (ORS 527.765).

Prior to approving any post-disturbance harvest rule, we encourage the Board to consult with ODFW and ODEQ as prescribed in ORS 527.710, to ensure the rule is consistent with sound management of water, fish, and wildlife resources. Given the degradation of resources likely to occur under the Proposed Post-Disturbance Harvest Rules, relative to standard vegetation retention, EPA encourages the Board to seek feedback from the US Fish and Wildlife Service and National Marine Fisheries Service to assure approval of the rule does not compromise approval of the pending PFA Habitat Conservation Plan.

Thank you for the opportunity to provide the Board these comments.

Sincerely,

Daniel Brown

EPA Northwest Forest Geographic Program Lead

EPA Region 10, Pacific Northwest

Oregon Operations Office; 805 SW Broadway, Suite 500; Portland, OR 97205

COLLINS Eleni * ODF

From: Darren Orange <darrenorange@gmail.com>
Sent: Thursday, September 19, 2024 11:34 AM
To: FORESTRY Boardof * ODF; FORESTRY Boardof * ODF; KELLY Jim * ODF; AGPAOA Liz * ODF; heath.curtis@odf.oregon.gov; Ben.deumling@odf.oregon; JUSTICE Joe * ODF; Brenda.McComb@odf.oregon; bob.vandyk@odf.orego; MUKUMOTO Cal T * ODF
Cc: geoff.huntington@oregon.go
Subject: ODF BOD Public Testimony Sept 6th 2024.
Categories: Testimony-Board-Mtg.

Darren Orange
81874 Phil Rd.
Astoria Or. 97103
darrenorange@gmail.com

Members of the board and State Forester Mukumoto,

Thank you for your time.

May I paint a picture of timelines and perspective as a community resident bordering a proposed timber sale. Is this the new reality of ODF wanting to work "in and around communities" in Oregon?

I am a homeowner and business owner residing in Clatsop County in Astoria. I've lived in this community 24 years. I've dedicated time to nonprofits and charitable events helping invest in our community. Together with my wife we boarder 300' with Clatsop Forest at the base of Mothball Hill. Our home houses an apiary which includes an active world wide audience of natural beekeepers in education and discussions. This is also the home of my residential contracting business, and my art business. We've devoted our time to amending the soil and building an organic subsistence garden and orchard. This is our investment into the future. Multiple springs are found on our property and 1 can be found running year around. We use these to feed our crops.

The Mothball Hill, and Davis Ridge timber sale has ignited a firestorm of concern in our community. I need you to understand and be aware of this. This is your legacy and it doesn't look good from our perspective. Can I help point out some areas of concern and request you change course and policy.

Our first clue that something would be happening was March 21 2024 when Stuntzner Engineering wrote a letter informing us of survey work. When the engineers came through they asked me about any slide areas...I found that interesting. May 4th we were introduced to NCCWP who informed us of the AOP 2025. **In a short time we requested a meeting with Astoria District regarding the plan and we were denied.** May17th the public comment period was closed and over a thousand comments for this year were sent. The Daily Astorian breaks the story after the public comment period igniting a concerned community. Astoria District and ODF BOD still issues no statement or notice to proceed. I wrote multiple letters and left calls to the ODF BOD'S and State Forester Mukumoto with only one response (May 10th) from Michael Wilson who took issue of me raising concern of previous timber harvest debacle at Gnat Creek Fish Hatchery. "Foresters took care to confirm that the cut trees were a hazard to the hatchery property, and those that live there." said Wilson. However, I have on two accounts one from a resident at

the fish hatchery and one a timber faller on site that a great many trees were not sick and did not need to be fallen. This was a timber sale opportunity with some of the largest spruces in the county. It's on good authority that many young trees and a green screen at the highway had also been removed unnecessarily.

January 19, 2021 The Columbian newspaper: "In a report the state made ahead of the harvest, the parcel — Area 11 — was identified as a high hazard landslide location" and from this harvest in 2018 which was ill advised jump forward 3 years a man was buried alive in his truck from a slide triggered by rain. The slide closed both directions of State Highway 30 isolating rural Clatsop County from first responders. The slide continued after every rain for months blocking traffic.

After multiple letters, calls to County and State officials I'm told by ODF Advisory Board I'm "misinformed" (to my reply I'm gleaned all and what little information available from your Pre Op Plan). I'm told to "harden my property" "your asking for a transfer of wealth." "we're not required to give you notice of sale." "your taking away money from schools." "a fire break would be a good thing." "we want to work in and around communities." "offer them firewood for appeasement"

All insulting comments!

To harden my property would require falling over 2 dozen mature trees on my property which would be compromised by forest removal (\$20k estimate). Fence built for introduced elk in the area (\$50k.estimate) Realtors and tax assessor suggests up to 15-20% property value decrease after clearcut (\$150k). Loss of potential organic certification of soil and apiary. (\$?) Exacerbation of slide area the neighborhood of Phil Rd. compromising 8 homes (\$\$\$\$\$\$). Change of spring locations possible to flood homes(\$\$\$\$\$). So to the above point I agree with a "transfer of wealth". **This is a shell game!** I stated above what I will pay in this mess. The residents pay for ODF and Clatsop County to profit. Insurance and ODOT paid for a man buried in his truck from ODF's slide but ODF still gets its quota and revenue regardless. As per Mothball Hill pre-op states: \$1.1million after expenses split county and state. County \$800k, State \$300k. What is the risk to reward here as I point back to 8 homes on Phil Rd. and multiple others on the other side of Mothball hill? YOU WOULD RISK THIS? As I pointed out above regarding the Highway 30 slide **I have no faith in competency in this agency** at the district or state level. **The lack of transparency. Denial of an initial meeting until public outcry demands it. Denial of survey reports; geotechnical, water, soil, and biological. Not being responded to in emails. And most recently a hostile environment as a citizen to give public testimony in a ODF BOD meeting as the Chair Kelly attacks Bob VanDyck who was the only board member taking initiative in his duty to make public outreach available. This attack on Bob VanDyk can only be seen as a planned and coordinated attack with Clatsop County Commissioners registered to zoom and applaud the scolding. Also concerning some very fallacious ad hominem attacks on Bob VanDyk by commissioner Bangs on her Clatsop County facebook page.**

June 27th meeting with Bob VanDyk, Dan Goody, Cullen Bangs, Brad Catton. To which I say too little too late...Well after the public comment period. Still no surveys or reports available.

July 2nd ODF finally gives notice of intent to sell timber harvest at Mothball Hill. Still no surveys or reports available....**This is bad policy!**

Local track records of bad decisions causing private property loss and trauma are not easily forgotten or forgiven.

The **most grave and barbaric motion is to use chemical spray after the clear cut.** Glyphosate, your chief ingredient in a cocktail. ODF is not being transparent about this contested concoction in class action lawsuits world wide. Concentration amounts and schedules are not available to the public. Regardless of the delivery application drift has been documented thousands of yards and even miles. This cancer causing chemical kills all ground and soil life including the much needed mycelium network crucial for tree growth.

I will mention I have a base test of my blood shall anything happen to me.

This is your legacy.

MY ASK IS YOU PLOT A NEW COURSE OF TRANSPARENCY. MAKE SURVEYS PUBLIC.

ESTABLISH A LINE OF COMMUNICATION WITH YOUR EMPLOYERS THE PUBLIC.

REEVALUATE THE OPTICS AND RISK VS REWARD AND MOVE AWAY FROM THESE SALES WITHIN CLOSE PROXIMITY TO HOMES AND FARMS.

EXPLAIN YOUR CULPABLE LIABILITY OF DAMAGES BEFORE THEY OCCUR.

Sincerely

Darren Orange

FROM MY ORIGINAL TESTIMONY TO ODF BOD SEPTEMBER 6TH.

(Thank you for your time and consideration.

I have invited you ALL to visit Astoria Dist. Mothball hill Davis Ridge only to deaf ear but 1. I have no illusion ODF Board has weight to change this timber sale and this has been stated to ad nauseam. And yet you attack each other.

ODF will hear its employer today voice concerns of its missteps and lack of transparency.

Still NO ODF scientific surveys available yet these sales go through?!

A water scientist's findings have been published and documented in public testimony with this board in June. You still move in opposition to these findings?!

My 300' foot dog in the fight is a boundary line shared with Oregon State Forest and you're not being a good neighbor.

First I challenge you to step up to your:

MISSION STATEMENT: To serve the people of Oregon by protecting, managing, and promoting stewardship of Oregon's forests. Not tree farming!

This is a transfer of wealth shell game. the people and insurance companies pay for ODF's missteps in profit.

My home property INVESTMENT estimated loss of 20% market value after clear cut as noted by realtors and county tax assessor.

\$20k tree removal to harden my land.

\$50k for a fence for introduced elk.

A deep seated slide noted in county records to be exacerbated in residential neighborhoods.

Tainted organic soil for our subsistence garden and marketable products.

Apiary business with a worldwide audience would be killed by sprays. These sprays are being contested world wide in class action lawsuits. Meanwhile I have recorded my blood tests for glyphosate base lines.

In 2021 ODF weighed risks and clear cut regardless of causing slide and covering highway 30 and burying a man alive.

And Gnat creek fish hatchery debauchery/timber harvest , residents still left in trauma after acres of healthy trees were slashed.

Your legacy. As you work in and around communities, your missteps will cause more damage to private property.

<https://www.columbian.com/news/2021/jan/19/oregon-weighed-slide-risk-before-logging-off-highway-30/>

<https://usrtk.org/pesticides/glyphosate-health-concerns/>

<https://open.spotify.com/episode/2hfeRRAlqBBXnoJMt9stPs?si=34Z7LZmZQjurZfbroYAiDw&nd=1&dlsi=05950bd757ad4c90>

From: [COLLINS Eleni * ODF](#)
To: [FORESTRY Boardof * ODF](#)
Subject: FW: You are signed up for Public Comment for September BOF Meeting - THANKS
Date: Tuesday, September 03, 2024 11:18:00 AM

Hello Ms Collin's,

I wasn't sure where to send my comment for Thursday spot so I hope it's ok I send it to you directly. I am hoping to be early in the public comments period as I have client arriving to my office at 10:00. Thank you so much, please find my comment following.
Denise Moore

Oregon Department of Forestry Board
2600 State St.
Salem, OR 97310

Subject: Opposition to Harvest at Davis Ridge and Impact on Clatsop County Ecosystem

Dear Members of the Oregon Department of Forestry Board,

I am writing to express my deep concern and strong opposition to the decision to move forward with the harvest at Davis Ridge, despite the overwhelming number of signatures from community members and concerned citizens opposing this action. It is deeply troubling that Dan Goody has chosen to proceed with this harvest, seemingly disregarding the voices of those who understand the value of preserving our natural environment for current and future generations.

The planned harvest at Davis Ridge threatens not only the delicate ecosystem of the area but also the vital habitat of salmon that reside in Gnat Creek. The importance of salmon to our local ecosystem cannot be overstated. These fish are not only a keystone species but also a critical part of the cultural and economic fabric of our community. The destruction of their habitat due to logging activities will have far-reaching negative effects, not just on the salmon population but also on all species that depend on this ecosystem for survival.

Furthermore, the proposed harvest will lead to the destruction of legacy forests, which are irreplaceable. These forests have stood for centuries, serving as vital carbon sinks, supporting biodiversity, and providing a natural barrier against soil erosion and climate change. To allow their destruction is to ignore the immense ecological value they offer,

far beyond the short-term financial gain that logging may provide.

It is deeply disheartening to think that future generations will look back and wonder why such a decision was made—why Clatsop County's forests were destroyed when there was a clear and strong public mandate to protect them. This action, driven seemingly without regard for public opinion or the long-term health of our environment, will leave a scar on our landscape and on the legacy of responsible stewardship that the Oregon Department of Forestry is meant to uphold.

I urge the ODF Board to motivate Dan Goody to reconsider this decision and to prioritize the long-term ecological health of our forests, waterways, and wildlife over short-term economic interests. We must listen to the voices of those who call Clatsop County home and work together to find sustainable solutions that protect our precious natural resources for generations to come.

Thank you for your attention to this matter. I hope the Board will choose to align its actions with the values of environmental stewardship and public trust.

Sincerely,

Denise and Ryan Moore

Confidentiality Notice:

This e-mail transmission and any documents accompanying it may contain confidential information which is protected by the attorney-client privilege or other grounds for confidentiality or nondisclosure. If you are not the intended recipient of the transmitted information, you are hereby notified that disclosing, copying, distributing, or taking action in reliance on the contents of this information is strictly prohibited. If you have received this transmission in error, notify the sender and delete the information. This communication is protected by the Electronic Communications Privacy Act, 18 U.S.C. 2510-2521.



7 September 2024

**TO: Oregon Board of Forestry
Cal Mukumoto, Chief Forester**
FROM: Ernie Niemi
SUBJECT: Informing Oregonians of Benefits and Costs

I am President of Natural Resource Economics. My comments here build on my more than 40 years of experience studying the economic consequences for Oregonians of actions that alter the functioning of forest ecosystems and their ability to provide valuable goods and services. These comments also build on those I sent your way, via email, earlier this year.

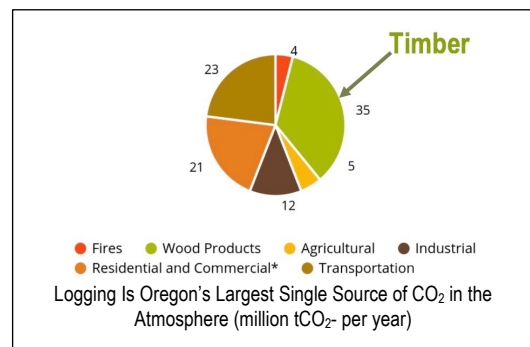
I hereby respectfully encourage and request that you provide Oregonians with a full assessment of the economic benefits and costs you anticipate will result from every major decision you make regarding the management of State forests. In the past, you have not done so, with some saying that Board members, staff, and prior Chief Foresters believed such analysis is not possible. This belief is not true. Widely accepted professional standards require such an assessment for every major resource-management decision. See, for example, the [Principles and Requirements for Federal Investments in Water Resources](#). The core intent of this document states that decision-makers:

“should strive to maximize public benefits, with appropriate consideration of costs. Public benefits encompass environmental, economic, and social goals, include monetary and non-monetary effects and allow for the consideration of both quantified and unquantified measures. [p.3]

You have no less of an obligation to Oregonians for your decisions: maximize the net public benefits, weighing all the costs and benefits, and considering both those that have monetary prices and those that do not [the absence of a price does not mean the value is zero, only something is not traded in a market and, hence, has no market price]. If you opt not to incorporate this obligation into your deliberations and decision-making, will you please explain why?

As you weigh the costs and benefits, I encourage and request that you consider these facts:

- A. In recent years, timber production in Oregon has produced about 4 billion board feet of logs and [35 million metric tons of carbon dioxide per year](#), or about 8,750 tons of carbon dioxide per million board feet.
- B. Federal agencies [recently estimated](#) that each metric ton of carbon dioxide added to the atmosphere will impose costs of about \$200 on society. This number sorely understates the actual damage, because it focuses on just five types of damage: from impacts on heat-related mortality (but not morbidity), workers' productivity, building cooling, sea-level rise, and food prices. A more recent analysis added to our understanding of the economic damages from climate change by estimating that the cost per ton of carbon dioxide from impacts on GDP, incomes, and jobs is more than \$1,000.



- C. Thus, the climate-related economic damage to society from timber production in Oregon is more than \$10 million per million board feet of logs, or more than \$40 billion for the industry as a whole. If the Board annually produces 185 million board feet of logs from State lands in Western Oregon, it will be responsible for imposing on society costs of about \$2 billion per year.
- D. A recent, exhaustive [survey of peer-reviewed research](#) concluded that it is reasonable to anticipate that one human death will result from each 3,700 tons of carbon dioxide added to atmosphere. The actual death rate probably is at least ten times greater because [the health data underlying past research fails to recognize most heat-related deaths](#).
- E. Hence, the production of each million board feet of logs in Oregon probably will results in the death of about 240 persons. For the industry as a whole, annual production of 4 billion board feet of logs will kill almost 1 million persons. If the Board opts to annually produce 185 million board feet of logs from State lands in Western Oregon, it will be responsible for killing more than 44,000 persons per year.
- F. Building on decades of research, [federal agencies estimate](#) that the economic costs to society from increases in mortality are monetized at a 2020 value of \$10.05 million. In today's dollars, the value is about \$12 million per death. Thus, the economic costs to society from logging in Oregon is almost \$3 billion per million board feet, or more than \$12 trillion for the industry as a whole. If the Board opts to annually produce 185 million board feet of logs from State lands in Western Oregon, the economic costs imposed on society from increases in mortality that results in the deaths of more than 44,000 people will total more than \$500 million per year.
- G. If log prices are \$800,000 per million board feet (\$800 per thousand board feet), this economic benefit will fall far short of the social damages (\$10 million) and the costs from the resulting mortality (\$3 billion).
- H. Some argue that, whatever the costs logging in Oregon imposes on society, they are outweighed by the benefits from logging as it contributes to the state's GDP, incomes, and jobs. If you assess this argument, please consider the evidence indicating the huge negative impacts carbon dioxide emissions and changes in climate have on these variables, indicated by [the research cited above](#).

You may find these numbers to be huge, perhaps even scary, but please, do not look away from them. They reflect the current understanding, by scientists and economists, of the realities of the consequences from actions that add carbon dioxide to the atmosphere.

Moreover, please recognize that these numbers do not represent the full costs to society from log production. For example, they do not incorporate costs from the impacts of industrial clearcutting on the quality and quantity of water in streams, or the risks and direct costs to neighbors and downstream water users from the application of poisons to on industrial lands. Though the numbers give an incomplete view of the full costs to society, I encourage and request that you consider them as you weigh the benefits of your decisions against the costs of different alternatives for managing State lands and determine which alternative will maximize the net benefits for Oregonians.

Thank you for your consideration of this information, and I pray that you will act on my requests. If you opt not to do so, will you please let me, and all Oregonians, know why?

If you have any questions, please contact me.

Public Forum Written Testimony, 9/4/24

Greg <jacobgk@comcast.net>

Wed 9/4/2024 2:59 PM

To: FORESTRY Board of * ODF <boardofforestry@odf.oregon.gov>

You don't often get email from jacobgk@comcast.net. [Learn why this is important](#)

My name is Greg Jacob.

I serve on the State Forest Advisory Committee and also on the Oregon Sierra Club Forest Conservation Committee.

As an environmental representative of SFAC, I care deeply about the future of Oregon's state forests, including finalizing the HCP, adopting a forward-looking Forest Management Plan, and implementing the Climate Change and Carbon Plan.

I am surprised to see that discussion on the state forest management plan and harvest scenarios on Thursday afternoon is not open for public comment.

While I value the perspectives of the Forest Trust Land Advisory Committee, they represent only a fraction of the values and interests of Oregonians on how their state forests should be managed. Our state forests have multiple values that go far beyond timber production and revenues for the counties represented on the FTLAC.

Western Oregon state forests have enormous potential for capturing and storing carbon to fight climate change if allowed to grow into older mature forests. This is being recognized in the development of the management plan for the Elliott State Forest. This approach should be happening on state forests managed by the Board of Forestry.

Besides listening to the wishes of the FTLAC, the BOF should also hear from the State Forests Advisory Committee to help determine future management of our state forests. The mission of the SFAC (and I quote) is to "offer advice and guidance to ODF on the implementation of the Northwest Oregon State Forests Management Plan." The SFAC "provides a forum to discuss issues," and ODF staff's role is not to simply tell us how state forests will be managed in the future.

Thank you.

Protect the social and economic values of State Forests

Jeremy Martin <Jeremy.Martin@nwh.com>

Fri 9/6/2024 9:47 PM

To:FORESTRY Boardof * ODF <boardofforestry@odf.oregon.gov>

With the HCP moving forward, please turn your attention to the preservation of the social and economic values of our state forests. Do not allow additional restrictions on the acres that were set aside for harvest under the HCP.

Jeremy Martin

Western Hardwood Procurement Director



Simple. Natural. Hardwoods.®

[360.736.2811](tel:360.736.2811) | [360.520.5565](tel:360.520.5565) m

3000 Galvin Rd Centralia, WA 98531

nwh.com |      



September 5, 2024

State Forester Mukumoto and Board of Forestry members,

My name is Joe Liebezeit. I am the Assistant Director of Statewide Conservation for the Bird Alliance of Oregon. Today I will be providing testimony regarding implementation of climate change strategies in Oregon's state forests as well as concerns about harvest within HCAs.

As some of you may be aware, during the 2023 legislative session the Climate Resilience package passed (HB 3409) with \$10 million appropriated for the Natural Working Lands Fund. Those funds are being dispensed to four agencies including ODF for investment in Natural Climate Solutions projects to ultimately help move forward Oregon's carbon sequestration goals.

- Over 3 million dollars of the NWL fund came to ODF. That investment has been focused on "advancing implementation of climate-smart practices as outlined in the Climate Change and Carbon Plan (CCCP)" as well as "Establishment of climate-ready seed orchards".
- We've been happy to see that ODF staff have been moving forward with the seed orchard project, however, there has been delay in moving forward with advancing the climate-smart practices in alignment with the CCCP
- While we understand part of this may be because those funds have only been available since last spring, we want to urge ODF to move forward and prioritize this effort for 2 reasons:
 - ODF will need to demonstrate efficient and smart use of the current funds in order for more to be allocated to the NWF in the future
 - On broader level, we have been struggling to see much progress on ODF's implementation of the CCCP and this new support from the NWF can help jump start some of that work. Please don't squander the opportunity.
- I want to switch gears quickly and just express concerns about harvest plans in HCAs. First, we commend the Board's recent adoption of the Western State Forest HCP, and the recognition that HCAs will be managed to maximize more complex, older age forests. This will meet requirements to protect 17 federally listed species as well as help move forward carbon sequestration goals as outlined in the CCCP.
- Yet, in viewing the current AOPs, we see a lack of detail regarding what specific "Climate-informed Silviculture" practices will be used for proposed harvests, particularly in the HCAs. On page 20 of the Climate Change and Carbon Plan, ODF describes the need to employ "Climate-Informed Silviculture" including planting multiple species with longer rotations. We can find no documentation on the progress of such measures in the AOPs. The implementation of such silviculture practices should be including in detail in the Implementation Plans and Annual Operation Plans
- I want to finish by thanking ODF Staff, Nick Pallazotto (Deputy Division Chief) for working with us to set up a field tour of HCAs coming up on Sept. 19th. This will be an opportunity for concerned folks to learn more about the specifics on ODF plans for harvest in HCAs.

Thank you for providing the opportunity for public testimony.

Joe Liebezeit
Assistant Director of Statewide Conservation
Bird Alliance of Oregon

Forest practices and Clearcutting on the North Coast

Kalani Whitney <happyhomesteadapiary@gmail.com>

Mon 9/9/2024 4:39 PM

To:FORESTRY Boardof * ODF <boardofforestry@odf.oregon.gov>

You don't often get email from happyhomesteadapiary@gmail.com. [Learn why this is important](#)

I am writing to encourage the forestry board to drastically adjust their clearcutting and forest management practices.

This issue hits close to home with the scheduled clearcutting of "Mothball Hill" and Davis ridge in Clatsop county. I was naive in my assumption that because these tracts of land supply critical fish habitat, support many ecosystems, and are adjacent to residential areas, that they would be protected from clearcutting. I was deeply saddened to learn how wrong I was.

The practice of clearcutting and aerial spraying decimates our local pollinator population, while simultaneously poisoning our drinking water, air, streams and rivers. This affects not just our families, but all species that call this area home. We have to be interested in more than the bottom dollar. There are ways to responsibly manage our forests. We cannot be so shortsighted that we destroy the things we, as Oregonians, and as living beings, hold most dear. I implore you to listen to testimony and find a compromise to clearcutting and spraying. It is possible to find a middle ground, and protect the things that need protecting.

Thank you for your consideration,
Kalani Whitney
Clatsop county resident

--

"Keep your face always toward the sunshine and shadows will fall behind you." - Walt Whitman

www.happyhomesteadapiary.com



COALITION OF OREGON LAND TRUSTS

2540 NE MLK JR BLVD, PORTLAND, OR 97212 • 503-719-4732 • OREGONLANDTRUSTS.ORG

September 3, 2024

To: Oregon Board of Forestry

From: The Coalition of Oregon Land Trusts

Board of Forestry Members:

On behalf of the Coalition of Oregon Land Trusts (COLT), thank you for the opportunity to provide comments at the September Board of Forestry Meeting.

COLT is a network of 31 organizations working across Oregon to protect our natural world – our water, wildlife, and open space – for all people, forever. Together, our statewide community of land trusts, soil and water conservation districts, and conservation organizations have protected more than 318,000 acres of land.

COLT members work in the private land arena, filling a gap in conservation by empowering everyday people to protect land for conservation, for all time, creating and keeping open space for wildlife, clean water, recreation, and working forests. Our members have extensive experience protecting and stewarding land, implementing collaborative restoration projects, and combining funds from a variety of sources to do both.

We know that the Governor’s guidance has precluded the agency from including additional funding for the Private Forest Accords Mitigation Grant fund and the Adaptive Management Program Committee (AMPC) in the Agency Requested Budget (ARB), but we want to use this opportunity highlight the critical importance both efforts have towards securing a federally approved Habitat Conservation Plan (HCP).

The Adaptive Management Program Committee is crucial for determining whether new rules are meeting key goals to support threatened salmon and the PFA Mitigation Grant Fund provides uplift for key species and conservation benefits through projects across Oregon. So far, that program has already granted out \$10 million in projects to benefit covered species.



24 MEMBER ORGANIZATIONS: Blue Mountain Land Trust • Center for Natural Lands Management • Columbia Land Trust
Deschutes Land Trust • Ducks Unlimited • Forest Park Conservancy • Friends of the Columbia Gorge Land Trust
Greenbelt Land Trust • Klamath Lake Land Trust • Lower Nehalem Community Trust • McKenzie River Trust
North Coast Land Conservancy • Northwest Rangeland Trust • Oregon Agricultural Trust • Oregon Desert Land Trust
Pacific Forest Trust • Southern Oregon Land Conservancy • The Conservation Fund • The Nature Conservancy in Oregon
The Trust for Public Land • The Wetlands Conservancy • Wallowa Land Trust • Western Rivers Conservancy • Wild Rivers Land Trust
8 ASSOCIATE MEMBER ORGANIZATIONS: Black Oregon Land Trust • Cerro Gordo Land Conservancy • Clackamas Soil & Water
Conservation District • East Multnomah Soil & Water Conservation District • Helvetia Community Association
Tualatin Soil & Water Conservation District • View the Future • Yamhill Soil & Water Conservation District

COLT and our members have been tracking this grant program since its inception and are eager to see development of the conservation easements and land acquisitions portions of the grant program. Most recently the Mitigation Advisory Committee (MAC) has moved forward a motion for ODFW staff to start to develop the land easement, fee acquisitions (restricted to non-forested lands), and water acquisitions portions of the program.

Conservation easements and acquisitions are explicitly mentioned as land preservation and threat reduction/elimination strategies in the Private Forest Accords, and our Coalition looks forward to engagement with the PFA Grant Fund as it continues to develop and mature. We will also work to advocate for additional funding for these programs with the Governor's Office and throughout the 2025 legislative session.

Thank you for your time and the opportunity to provide comments.

Sincerely,

Karsyn Kendrick
Conservation Director
Coalition of Oregon Land Trusts



Ethical Integrity or “Slop Pool”?

Chair Kelly, Board of Forestry members, State Forester Mukumoto: thank you for the opportunity to testify today. My name is Lianne Thompson, and I’m a Clatsop County Commissioner speaking only for myself today, September 4, 2024.

I’m offering praise for the “**Board Policies Manual (BPM) for the Oregon Board of Forestry**” that you adopted on March 6, 2024. I’ve read it and appreciate the thoughtful approach and clear language.

Now I’m asking you to consider how you apply it when there has been a breach in the ethical standards you’ve just set. I’m also asking you to consider if you want to add written consequences for a board member who violates your policies on ethical conduct.

Most importantly, I’m asking you to act on this breach.

To cite your document:

1. **Policy 3.4:** the Chair maintains the integrity of the board’s process
2. **Policy 3.11:** board members are expected to be ethical and respectful
3. **Policy 3.11.5:** board members’ mission is to serve the public, not create a personal platform
4. **Policy 3.11.6:** once the board makes a decision, all board members will respect the decision and move forward “speaking with one voice”
5. **Policy 4.1.4:** no board member has authority over the State Forester or staff
6. **Policy 4.1.5:** requests for additional information are handled in a process defined in the board policies
7. **Policy 4.3.1:** the State Forester is required to report to the Chair any personal actions or behavior of himself/herself or others that could *potentially discredit the integrity of the board, the State Forester, and/or the agency.* [emphasis mine]
8. **Ibid:** If the board finds the State Forester’s actions illegal, unethical, or immoral, suspension or termination may be the result

Now then, since you’ve already experienced a challenge to those policies, how will you respond? Will you ignore it, pretend it didn’t happen, or will you notice, because you are monitoring your standards?

Most importantly, will you act? Will you hold yourselves and each to an ethical standard, as you describe in your bright, shiny, and so-far-untested code by taking effective action?

Rather than have a lecture on ethical integrity, let’s take ourselves to an imaginary pool hall and consider two different ways to play the game of pool.

In one way, the player calls out a specific ball and a specific pocket into which that player will attempt to sink the ball.

That's holding oneself accountable to a high standard of performance, because if that named ball doesn't land in the named pocket, the ball goes back on the table. No gain.

In the second way, termed "slop pool" by the higher-level players in the game, any ball that lands in any pocket counts. There's not as much skill or integrity involved here. There's a looser definition of "winning." It's sloppier.

Let's also quote Nigel Jaquiss, who once said, "Corruption in Oregon doesn't look like envelopes full of hundred-dollar bills being passed. Corruption in Oregon looks like cronyism without accountability." Cronyism without accountability.

Rather than ignoring or tolerating corruption, treating each other like cronies, please exercise accountability.

Please act both compassionately and decisively to address the ethical breach created by your board member's recent actions in Clatsop County.

Thank you for your time today, and thanks to R.W. Knight, my beloved grandpa, who created my moral template.

Board of Forestry Testimony

September 4, 2024

Chair Kelly, State Forester Mukumoto and members of the Board:

I'm Mark Kujala. Chair of the Clatsop County Board of Commissioners. I appreciate the Chair and State Forester taking action to clarify the policy regarding a Board member trip out to Clatsop County because it did create confusion in our community, on our Board, and at the Astoria District.

I last provided testimony prior to this Board's decision on the HCP, and we felt there was more work to be done before moving forward.

I remain disappointed in the Board's decision, and we are now left pick up the pieces. The HCP has disproportionately costly impacts to Clatsop County, and we are struggling to find ways to plug the holes it has left and will continue to leave, in our local budgets. I strongly feel these economic impacts should have been addressed by the State of Oregon prior to any decision on the HCP, and now these will only be compounded over the years by the direct losses to our local forest sector as state harvest levels drop.

We have paid a high price for this HCP, and it would be incredibly irresponsible for the Board to now inflict more economic harm to our communities with the companion Forest Management Plan. As you know, the HCP was focused entirely on environmental goals and moved forward without a single amendment to account for the social and economic values of these forests. None.

With the HCP now moving forward as is, the Board's goal should be to maximize the social and economic benefits allowable under this HCP.

I urge the Board to remember that we have already set aside half of the forest for conservation and reduced harvest by tens of millions of board feet under the HCP. There is no need to add additional restrictions on the harvestable acres that remain. Those acres need to be actively managed because that was the intent having an HCP.

Our communities cannot afford more restrictions, especially those with such indistinguishable environmental outcomes. Additional restrictions would only multiply the economic problems we are currently trying to address thanks to the ODF Board's decision.

We need transparency and accountability now more than ever. Chair Kelly – I appreciate your comments about not wanting to do more harm. I hope the rest of the board shares the same sentiment and works together to preserve and protect the remaining workable acres left on state lands—acres that provide jobs, revenues for essential public services, and much needed building materials.

Thank you.

Mark Kujala

Chair, Clatsop County Board of Commissioners



TO: Oregon Board of Forestry and State Forester Mukumoto
FROM: Michael Lang, Wild Salmon Center
RE: Implementation of the Habitat Conservation Plan and Climate Change
and Carbon Plan
DATE: September 4, 2024

Dear Chair Kelly, members of the Board and State Forester Mukumoto,

Thank you for the opportunity to provide comments. My name is Michael Lang and I work for the Wild Salmon Center (WSC). WSC is a nonprofit organization based in Oregon that works to protect and restore healthy forests and rivers to support thriving wild salmon populations in the state and across the Pacific Rim.

As the Board of Forestry (Board) considers the future management of state forests, WSC recommends integrating the requirements of the Habitat Conservation Plan (HCP) and the actions described in the Climate Change and Carbon Plan, adopted by the Board in 2021, into its decision-making.

As you may recall from previous comments, WSC has mapped western Oregon state forests and determined the location of forest stands over 80 years old. Thirty percent of the existing mature stands that are older than 80 years are located outside of Habitat Conservation Area (HCA) and Riparian Conservation Area (RCA) boundaries. However, recent clearcuts were included within the HCAs, providing no benefits for covered species. Any major disturbance may result in insufficient habitat to meet the biological objectives of the HCP.

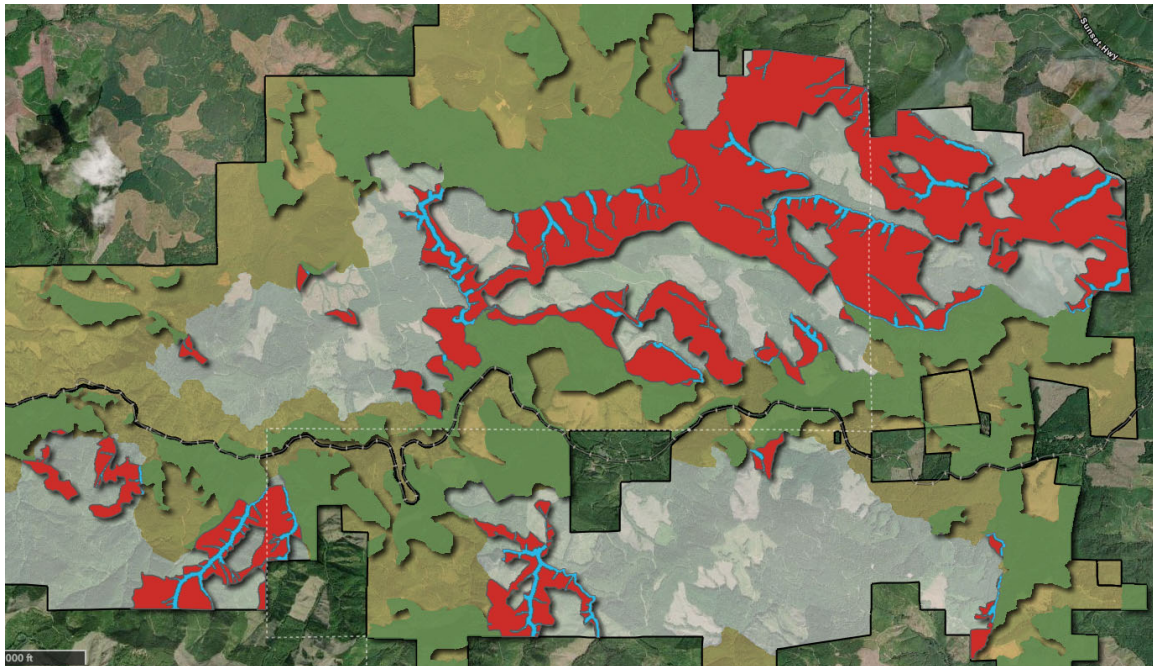
The HCP, Chapter 8, contains a “stay-ahead” requirement to ensure a net gain of habitat and no temporal losses in habitat associated with covered activities. If habitat is lost due to natural disturbances, such as fire or the increasing effects of climate change, adjustments can be made in the implementation plans to ensure that the stay-ahead requirement and the biological objectives are met.

To meet the requirements of the HCP, the retention of older forest stands, particularly adjacent to HCA and RCA boundaries, may be required. These mature stands could provide habitat reserves if adjustments to implementation plans are necessary due to a major disturbance.

INTERNATIONAL HEADQUARTERS

2001 NW 19th Avenue, Suite 200 • Portland, Oregon 97209 USA • Tel: 503.222.1804 • Fax: 503.222.1805
info@wildsalmoncenter.org • wildsalmoncenter.org

For example, the map below depicts a segment of the Tillamook State Forest in eastern Tillamook County and western Washington County. Forest stands shaded in tan are HCAs. Forests in green shading are stands older than 80 years and located within HCAs. Forest stands in red shading are over 80 years old and are excluded from HCAs and RCAs. Older mature stands excluded from HCAs and RCAs should be evaluated for suitability as habitat reserves to ensure that the stay-ahead requirements in the HCP are met.



Establishing mature forest reserves would also help implement the [Climate Change and Carbon Plan](#) (Climate Plan). Oregon's coastal temperate rainforests are among the rarest ecosystems on earth and are also the most carbon dense, presenting several opportunities for carbon capture and storage. The vision of the Climate Plan is to establish Oregon as a national leader in climate-smart forestry. To fulfill this vision, the Climate Plan includes multiple supporting actions that “**will** be incorporated into agency actions.” (Climate Plan, page 31) (Emphasis added)

These include the following:

- Incorporate climate change into the Forest Management Planning (FMP) and Implementation Planning (IP) processes.
- Implement silvicultural practices and harvest rotations that increase carbon storage in the forests.
- Identify climate sensitive habitats and protect them.
- Identify areas with high carbon storage potential and provide for long-term carbon storage.

According to the Climate Plan, the ODF currently has the statutory authority to implement a forest carbon offset program. The Climate Plan directs the ODF to develop an internal carbon price in decision-making and to develop a carbon offset program.

Mature forest reserves could provide the basis for a carbon offset program and provide revenue to the ODF and the counties.

The Board and the state forester could also protect previously unmanaged or legacy forest stands, like Mothball Hill, as carbon reserves and also ease conflicts with adjacent property owners. Carbon reserves are consistent with existing Board-adopted policies, and could be used for a carbon credit system.

Thank you for considering these comments.

Sincerely,

Michael Lang
Oregon Senior Policy Manager
Wild Salmon Center

From: [Rebekah Phillips](#)
To: [FORESTRY Boardof * ODF](#)
Subject: Implementation of the Climate Change and Carbon Plan
Date: Friday, August 30, 2024 9:15:56 AM

You don't often get email from rebekahphillips@mazamas.org. [Learn why this is important](#)

To: Chair Kelly, Members of the Oregon Board of Forestry
Cc: State Forester Mukumoto, State Forest Division Chief Michael Wilson
Date: August 30, 2024

Re: Implementation of the Climate Change and Carbon Plan

Dear Chair Kelly and Members of the Board of Forestry,

The Mazamas is a mountaineering organization with thousands of members based in Portland, Oregon. The Mazamas has promoted conservation in Oregon since our founding in 1894.

We are writing to strongly encourage the Board of Forestry (BOF) and the Oregon Department of Forestry (ODF) to fully implement the Climate Change and Carbon Plan (CCCP) that was approved over two years ago.

The CCCP aims to transform the Oregon Department of Forestry into a national leader in Climate-Smart Forestry. This approach prioritizes climate mitigation and should encompass the following actions:

- Optimizing forest carbon sequestration
- Extending harvest rotations
- Enhancing forest resilience
- Reducing greenhouse gas emissions
- Protecting old-growth and mature forests, as well as biodiversity

To achieve these goals, ODF should establish and maintain a carbon inventory for state forests, proposed Habitat Conservation Areas (HCAs), and Riparian Conservation Areas (RCAs). These areas should be managed as carbon reserves.

Additionally, ODF should set clear targets for increasing carbon sequestration and storage, along with a detailed roadmap to meet these targets.

We also recommend that BOF and ODF collaborate with the Department of State Lands to develop carbon offset projects within state forests.

Thank you for your attention to this important matter.

Sincerely,

Rebekah Phillips (she/her)
Executive Director
971-420-2501



mazamas.org | Inspiring everyone to love and protect the mountains.
Become a member today!



Personal Testimony to Board of Forestry - September 5th, 2024

Good morning, my name is Richard Felley. I have resided in Tillamook County since 1981. I moved there just after earning my degree from OSU in Wildlife Science.

I came here today to go on the record with a few very serious concerns I have about forest practices in this state.

FOREST PRACTICES MUST PROTECT DRINKING WATER

- I drive along the lower Miami River and Three Rivers several times a year as I travel to and from Bend. With recent knowledge from studies and reports by Perry & Jones 2016 and Segura 2020 I was inspired to do a little research when I noticed how different the flows of these two rivers looked in early August 2023. I learned that both watersheds are nearly the same size but Three Rivers was flowing about 4 times as much water as the Miami. Both watersheds are very similar with one exception, forest management. Three Rivers is primarily Siuslaw National Forest while the Miami is almost entirely Tillamook State Forest.

Also significant, during winter rains, the Miami appears muddy while Three Rivers appears quite clear during the same events.

Concern Number One: Are forest practices robbing rural landowners and coastal communities of drinking water and impacting water quality?

ON THE SUBJECT OF HARVEST RATES AND POOR REGROWTH

- With images 1 through 4 I wish to bring to your attention the look of the land in the coastal hills of Tillamook and Clatsop counties. View number 1 is looking from Onion Peak toward Saddle Mountain. These lands are owned and managed by private companies such as Weyerhaeuser, Hampton Lumber, Stimson Lumber and Nuvene Natural Capital, also known as Lewis & Clark Tree Farms and Greenwood Resources. Some of these companies are publicly traded on Wall Street, therefore their focus is upon short-term revenue and profit rather than maximizing lumber production and true sustainability of the resource.

Concern Number Two: Despite claims of sustainability I am concerned

that harvest rates are **extreme**, regrowth is impeded due to application of herbicides, hotter weather, longer dry periods, soil depletion and more exposed ground. Tree farms may not be regrowing as they used to.

- Images 5 and 6 show greater detail about failed replanting. Number 5 (Nehalem North Fork watershed) shows a planting of 5 to 10 years in age that appears 90% has failed. Image 6 is an area east of Netarts in Tillamook County.

Concern Number Three: If, as Oregon Forest Resources Institute states repeatedly on television and other media that everything is wonderful with forestry due to the strong protections offered by the Forest Practices Act, then why was I able to gather thousands of images like these in just 2 days in 2022 and 2023? I think everything is **not okay** with forest practices in Oregon and I urge the Board and ODF administrators to spend some time looking at Google Earth satellite imagery and also climb into an airplane or helicopter and survey forest areas first hand.

- While we were taking photographs on November 15, 2022 in Clatsop County the east winds came up. No fewer than 6 slash burns went out of control and had to be dealt with by local firefighters and also caused evacuations.

SLASH BURNING

Concern Number Four: This forest practice, like others, is out of date. With increased average temperature and dryness and the need for retaining soil fertility, slash burning removes carbon from the soils and places it directly into the air where we need it the least while also increasing the risk of wildfires.

LANDSLIDES

- Finally, image number 7. Just one example of many. This landslide just occurred during a rainstorm in December 2023. Estimated 100% slope above an important spawning stream known as Foley Creek. I have looked at the ODF slide maps and come away with many questions.

Concern Number Five: What is the intent in creating a new slide mapping system to replace the long-standing mapping that the Department of

Geology and Mineral Industries (DOGAMI) has developed for decades?
Areas that I know to be slide prone do not appear on the new ODF
mapping. ODF slide mapping appears to be incomplete and unsuitable as a
replacement to DOGAMI mapping.

Respectfully submitted - Richard Felley

From: [Rose Schneier](#)
To: [FORESTRY Boardof * ODF](#)
Subject: Comment for 9/4 & 9/5 Board Meeting
Date: Monday, September 02, 2024 10:43:24 PM

You don't often get email from rose.schneier@gmail.com. [Learn why this is important](#)

To the Oregon Board of Forestry:

I am a Board Certified Pediatric Endocrinologist (recently retired). My colleagues and I have significant concerns about the environmental risk to children's health posed by environmental chemicals, including the pesticides used in Oregon's state forests.

I have recently become aware that one of the most common herbicides used in helicopter spraying in Oregon's state forests is glyphosate. Although many investigations on glyphosate toxicity in animals have suggested the low toxicity of this compound, leading to the classification of glyphosate in the least toxic category by the United States Environmental Protection Agency (EPA) as recently as 2020, these studies have assumed a very low level of exposure from standard application. Although glyphosate is assumed to be readily degraded in soil, its biodegradation is influenced by numerous factors, including physico-chemical, biological properties and soil composition [15]. Thus, the half-life of glyphosate in soil can range from 1 to 280 days, while that of aminomethylphosphonic acid (AMPA), its main metabolite, ranges from 23 to 958 days (Costas-Ferreira, et al. [Int J Mol Sci](#). 2022 May; 23(9): 4605). Repeated applications within a season can lead to significant environmental accumulation and exposure of humans and animals to glyphosate; residues have been found in the urine of 60–80% of the general population in the United States (ibid). Although glyphosate has not been definitively established as a carcinogen, there is a growing body of research suggesting that this chemical can have adverse effect on nervous system development in young animals and may be involved in the development of chronic neurological diseases.

Because of the potential for significant environmental accumulation and persistence of this chemical, and the emerging science suggesting potential neurotoxicity, I urge the Board to consider at least limiting the use of glyphosate in helicopter spraying programs pending more extensive assessment of actual environmental levels in areas surrounding spraying, both immediately and over time.

Thank you for your attention to this important concern.

Rose L. Schneier MD
3703 East Burnside Street
Portland OR 97214

To: Oregon Board of Forestry
From: Scott Killops
Subject: Public Comment for the Board of Forestry Meeting on September 4-5, 2024
Date: September 4, 2024

Thank you for the opportunity to provide a public comment for the Board of Forestry (Board) meeting on September 4-5, 2024.

The [agenda for the September 4-5, 2024 Board meeting](#) includes this statement:

“BOARD WORK PLANS: Board of Forestry (Board) Work Plans result from the board’s identification of priority issues. Each item represents the commitment of time by the Board of Forestry and Department of Forestry staff that needs to be fully understood and appropriately planned. Board Work Plans form the basis for establishing Board of Forestry meeting agendas. The latest versions of these plans can be found on the Board’s website at: <https://www.oregon.gov/odf/Board/Pages/AboutBOF.aspx>.”

With this in mind, I would like to call the Board’s attention to its [Climate Change and Forest Carbon Work Plan 2022-2024](#). There has not been a Board review of progress on this work plan nor of progress on ODF’s [Climate Change and Carbon Plan \(CCCP\)](#) in over two years. With only four months remaining in 2024, I would like to request that the Board schedule a review of progress on both of these plans before the end of the year.

On a related note, [Forest carbon accounting](#) is foundational to setting and measuring progress towards ODF’s carbon sequestration and storage goals. On September 7, 2022 ODF presented an update to the Board on [State Forests Carbon and Inventory](#). That update included plans for an Enhanced Forest Inventory (EFI) system. EFI is the planned data source for several [Performance Measures \(PMs\)](#) for the [Draft Western Oregon State Forests Management Plan \(FMP\)](#). However, it’s not clear from more recent reports like the [2023 Stand Level Inventory \(SLI\) Annual Report](#) whether EFI is ready for use. I would like to request that the Board schedule a review of ODF’s forest carbon accounting program including the status of EFI.

Thanks again for the opportunity to provide a public comment for this Board meeting and for all the hard work that the Board and ODF perform on behalf of all Oregonians.

Respectfully,
Scott Killops
350PDX Forest Defense Team Member



Attachment 1 to Public Forum Written Comment on the WUI Hazard Map and Risk Ratings Process

1 message

T L- Mattis <upwolfcreek@gmail.com>
To: T and L Mattis <upwolfcreek@gmail.com>

Mon, Sep 23, 2024 at 6:58 AM

From: **T L- Mattis** <upwolfcreek@gmail.com>

Date: Thu, Sep 19, 2024, 5:46 PM

Subject: Attachment 1 to Sept 4, 2024 Public Forum Written Comment to the Board of Forestry regarding the Process used in developing and releasing the Hazard Map and risk ratings.

This Attachment contains details of physical context which are not just anecdotal or belated suggestions for regional climate-based fine adjustments to your prescribed Defensible Space vegetation management regime: this is the reality check that results from engaging in vegetation management planning in a different ecology without having included early in the process the perspective and experience of the people who actually know it, the people who live in or next to the WUI in SW Oregon. This ecoregion has a substantially different climate from the other four regions of the state. Here there is true savannah that exists in only two locations in North America. The people who know it and live the experience of owning land here did not have the luxury of a subdivision with abundant water and the sewage already plumbed in. They had to develop that capacity for themselves; balancing availability against need. Where there's not enough water to irrigate a suburban style green turf lawn, the fuel break made of gravel will soon fill up with tall annual weeds which dry up in June to become a fire hazard needing intensive management; in this case it is preferable to allow the green native vegetation to remain— it is adapted to the unique soils and Mediterranean climate here. Some of the prescribed defensible space vegetation reductions are actually dangerous for the people living in poorly insulated homes on hotter aspects with no air cooling systems. (See Attachment 2, The Parable of the Shade Tree That Should Have Stayed.) Under the protection of a forest canopy, home insulation typically hasn't been necessary. Cut away the forest shade and the increasingly longer periods of extreme heat will be deadly without modifying the interior of the home. Clearly, this fact was not considered when the defensible space codes were written because there were no public participants engaged who knew the climate conditions in the SW Oregon.

Your online literature describes public participation, but was that just a corporate interest? (ie., conservation orgs, sports groups, and logging or mining interests.) Corporate participants in state planning processes are a part of the public, but have a different point of view from rural residents in forestlands, and they cannot be a substitute for the local community's climate knowledge because they are not familiar enough with the soils, water cycle, weather patterns that a resident must deal with to manage a home here. These local residents are the affected public described in Oregon's state policies on public participation under ORS 183.333, statutes the Dept. of Forestry and Fire Marshals should have followed when planning the defensible space codes and changing land classifications. These are the actual people who, in the near future, will be expected to physically comply with this plan as the letter of the law. Engaging them before decisions are made that may be unworkable in the local climate is the smarter choice, one more easily accepted by people who must comply but know they cannot keep a grass lawn green throughout the long drought and high temperatures of summer in the Rogue basin. The agencies would know that they needed to explore an acceptable alternative form of vegetation management. This is what "public engagement" truly means.

Each homeowner in the WUI has his/her own water supply, sewage system, electricity hookup, a driveway or private road, and some sort of yard in native vegetation. Nobody just hires a landscape maintenance provider to come and water and trim the imported sod or use a gasoline-powered leafblower to blow dropped leaves away. The homeowner must develop and then maintain "yard" features. Next time you visit SW Ore. in summer, take a drive through some of unincorporated communities that populate the WUI. Make a point of noting the "yards" surrounding homes. Ask yourself if you see predominantly neatly trimmed green lawns where there is a grassy yard? I can tell you right now that you won't see much in the line of green turf around homes in the Rogue River watershed.

Here is the Myth of the Well-Maintained Yard Where Green Grasses Do Not Grow:

Your plan has stated that a suitable defensible space could be a "well-maintained yard". I called up one of your information contacts and asked for a definition of that phrase. He described "well-maintained" as meaning a regularly cut, green grass lawn.

In rural SW Oregon, where virtually every home is on its own well or spring for domestic water, having enough to irrigate a grass lawn requires more like an Cartesian well than a hand dug cistern capturing a spring. Few can support the amount of water to keep sod green during our long drought season. The varieties of grass grown from hardware or department store seed or Willamette Valley roll-out turf are not adapted for the burning heat of the first weeks of summer here. They burn to brown in the sun and go dormant until wetter, cooler weather returns. You can (and I have) water that burned out patch of lawn every darn day and it is not going to turn green again until it is ready. It has a genetic code that no amount of regulation is going to alter. I have been advised by working landscapers to buy a "high desert blend" of grass seed to re-grow a lawn in bare dirt here in the Rogue Valley region. I have spent 3-4 years trying to put the available generic lawn grass seed on local soils in this savannah climate and now have partial dirt and grass that turns shrivels to brown in full sun every June. It stays that way until October. In fact, the only places a grass lawn stays green around here is if it has shade at least half the day. And the defensible space this program prescribes removing that shade. Sure, grass lawn won't be as likely to carry fire as the native ground cover, but the green turf won't grow here. Any under-educated local can tell you that a grass lawn isn't worth the bother unless it is grown under shady conditions. Had an attempt at public engagement been made more along the line of approach described in OAR 860.300.040 your process would have allowed for the sort of useful feedback that this reality check provides earlier in the development process. As it stands now, the phrase "or a well-maintained yard" is a meaningless option in a defensible space prescription that creates as many problems as it makes solutions in our hot, droughty climate. The language has already been codified and the comment period is closed.

And I will lay money that the east side homeowner will not find that high desert mix of grass seed on the shelf at the Home Depot either.

Onus and Equity in Creation of Defensible Space in High Risk Oregon.

This detailed context explains how the residents of SW Oregon have been unfairly shorted in notification of the program and response time to address it or appeal their ratings if material errors in fact were made.

The suggestions made later in this attachment provide some specific actions that should be taken to remedy omissions and the lack of scope in planning the Defensible Space codes that would have been spotted by members of the affected public had they been cognizant of the defensible space codes before the end of the comment period.

I would like to refer the Board to the following State of Oregon administrative procedure:
OAR 860.300.040 Wildfire Mitigation Plan Engagement Strategy

The Hazard Map WUI Defensible Space process could have taken from this statute for its required approach to public engagement. It demonstrates a sincere intent that people residing forested areas of Oregon are notified of and involved in creating the public safety measures expected of the electricity companies serving them in high risk areas.

As it is, I only became aware of the Hazard Map release because I had signed up with ODF for news releases on the Fire Risk Map program. We don't get the Grants Pass newspaper, but watch the local evening newscasts regularly and did not hear them mention anything about the single public meeting being held to inform people in this county that they were involved in this program, yet the majority of residents here live outside the two incorporated cities of Josephine County.

In the first release of the Risk Map, there were two informational meetings scheduled to be held in each locality. The actual map was available for people to see, and it appears that comments could be submitted immediately. And there was a full 60 day period for acceptance of comments and rating appeals. Then the map and ratings were withdrawn before any meetings were held here in SW Oregon, arguably the most fire-prone landscape in Oregon and more densely populated than east side counties. Afterwards, we received a truncated version of the public engagement offered to the rest of the state. For example, just one public meeting was announced, presumably in the Grants Pass newspaper. This is the process my Public Comment addressing: the process of implementing the Defensible Space Codes, and is not a comment directed at the content of the map, nor the ratings. I am officially informing the State of Oregon via the Board of Forestry that this is NOT EQUITABLE treatment.* Poor notification has made the 30 day comment and appeal period following the Hazard Map release date INADEQUATE for the affected public residing in the WUI. It may be that being behind on your scheduled timeline caused an arbitrary compressing of the public notification and comment period. Arbitrary is not equitable. Announcing the new timelines in a meeting few knew about without also updating the Dept. of Forestry web page describing the process is confusing and misleading about the period when comments or appeals can be made. In another instance, we thought that clarification on hazard-mitigating irrigated pasture might alter the hazard rating for our property. The language defining how irrigated pasture reduced hazard didn't happen before the comment/appeal period ended. Our questions about an element that could well have altered our property's rating remain unanswered. Regardless of the technical delays to your schedule, every area of the state should have been given the same level of public engagement and the same period to consider and make comment. This was a process that every rural household in SW Oregon should have been made aware of. We should be equal to the rest of rural Oregon in the eyes of the state. Most people living in this county were unaware the map and its release for comment. I went to the Grants Pass meeting, but the map and rating data were not available. There was nobody to ask my questions of when the map was finally released. The OSU guy I had questions for wasn't there to make them sensible for those who were fielding comments and rating appeals.

* As such, I have included at the end a list of the various parties or state agencies that I will send a copy of the comment and attachments to, so they too, are made cognizant of the claim that our area was not given the same opportunities as other, less hazardous areas of the state. It is my intent to make this a matter of record.

Moreover, by refusing to consider rating appeals from residential owners living outside of the WUI, there is an inaccurate assumption being made that the hazard ratings will have no impact upon their insurance costs or other elements within their lives. And it cannot be assumed that county governments would not implement the defensible space and fire hardening construction codes on a county-wide

basis regardless of your intended implementation plan. In a county where development codes have been mis-used to wrest rural properties from their owners, this latter issue raises red flags that the whole wildfire resistance program may be used as another form of land grab, continuing a pattern of gentrification that is adverse to many long term residents. These counties are not scrutinized by the state for compliance with the state's Administrative Appeals statutes when mis-using development codes. They have been using land development codes to take away family properties for some years here in Josephine County.

While the recipients of this comment may doubt the veracity of my testimony in this regard, I can provide compelling photodocumentary and written evidence that this issue is real and a legitimate concern for landowners across Josephine County. Before dismissing this concern out-of-hand, I humbly submit that the powers that be should at least examine the substantial evidence which supports this claim. It would go a long way towards your understanding that THE COUNTY IS NOT OUR FRIEND. There is and will be a reluctance from people living here to reach out to any county departments for clarification on how to apply the new landscape and building fire hardening codes. Josephine

County already has code requirements that implement elements from FireWise planning covering the area 100 feet from the house. The two codes are divergent, so which one does a resident in the WUI follow? Had the residents of this county been engaged before everything had been decided, this incongruity would have been recognized and a decision made between the county and the state that did not conflict.

Each department of state government has its own description of forestland, whether it be for Zoning purposes, building requirements, tax rates, water rights, etc. All these different divisions have additional rules and requirements affecting everything from agricultural crops to commercial forest and woodlot use, Fire Marshal requirements, those that affect light industry, business registries, and labor laws. Each and every one of these departments, divisions, and agencies state that it is the LANDOWNER'S RESPONSIBILITY TO KNOW ALL THE RULES THAT APPLY TO THEM. These words are invariably spoken by a person who does not even know all the rules being imposed by the department they work for.

Even for the well-educated owner, it has become an onerous burden to even find all the various rules and definitions that apply to owning and using their property. For those that grew up on these forest ranches and mining claims or homesteads, the new regulations that apply to their homesites since the 1970s are staggering. We can't stick a sign in the front of the house without applying for and paying for a permit. To sit a one-piece plastic water tank on the ground for fire protection, this county requires not just one, but two expensive permits for an item otherwise exempted by the State from requiring a building permit. And now SB 762 has added to this mess of requirements and with additional permit fees to pile upon the guys who were born out in the sticks or just want to not live in town -in part because they can't afford to.

Just so you can understand that, while the rural public will generally appreciate the intent of this program, they do not welcome the increased bureaucracy that comes with it. Their engagement has been nonexistent and that of itself does not encourage their cooperation. It is reasonable for a landowner living outside the WUI to anticipate additional burdens to result from it.

Sure, nobody wants to face a seemingly hostile public worried about what's next that they have to deal with. Engage them, give them a chance to air their concerns, learn that it may not all that bad for them, let them actually know what your program is about instead thrusting it upon them without ground-proofing it for elements I am discussing in detail here in my comment attachments. Your engagement process should have at least given real notice according to the locally accepted protocol for two scheduled informational meetings with the full 60 days to let it sink in and meaningful comment be

made. The rural residents that missed the whole introductory notification thing are, in fact, the stakeholders most affected by this program. You blew right past them.

Alongside the encapsulated suggestions that follow, please consider re-opening the comment period for the Hazard Map using the engagement methods specified in OAR 860 300 0040 and give SW Oregon residents the full 60 days to make comments that was offered to the rest of the state.

And please allow for acceptance of appeals to the Hazard Map ratings from non-WUI residential landowners. After all, we are occupying the same fire-prone landscape. Wildfires do not recognize boundary zones.

The following suggestions have also been included in this written public comment to address omissions regarding the role of public utilities in creating and maintaining defensible space along the WUI zones in High Hazard areas. The local field managers, particularly Pacific Power's, have no clue whatsoever as to what the performance standards are for tree pruning along the power line Right-of-Way, nor even where to find it.

--Ensure that Right-of-Way utilities, especially electricity providers, railroad operators, and county road maintenance managers are cognizant of the specifications for vegetation management that apply to them and make sure their field supervisors actually inspect for compliance with state mandated standards as a matter of public safety.

--Update the standards for performing vegetation clearances to recognize the fire hazards created by leaving inflammable fines and other dead vegetation residues alongside public roads and railroads. Include removal of slash in the performance standards applicable in Oregon's forested landscape.

--Consider banning roadside/railside herbicide spraying as a method of controlling vegetation as the hazard it creates in flammable ladder fuels outweighs the economic benefits in our hotter drier world.

--Apply vegetation management standards for utilities contiguously across High Hazard rated landscapes.

--Evaluate the changes in temperature around homesites that will occur from removing tree and tall shrub canopies. It is likely that the current codes will create dangerous conditions within many homes as illustrated in Attachment 2.

--Use the extensive data already held by electricity providers to extrapolate the increase in power demand that will occur from installing air conditioning systems in rural residences.

--Make inexpensive air conditioning systems and insulation improvements widely available to lower income rural communities without threatening their ability to live in their existing homes by aggressive code enforcement actions.

--Analyze the near-future power demand effects on the existing supply system in light of the increased demand. Determine what the capacity should be for each region.

--Create a true cost analysis of these improvements to include in future planning that surely must be occurring. Determine where that revenue could or will be raised. Use these data when developing grant applications for federal subsidies and non-governmental sources of funding.

--Use agriculture extension services to develop low growing vegetation cover and or drought hardy desert/ savanna species of grass to replace higher flame length classes of green ground covers and

retain relative humidity with normal variability of native forest species.

-Use enterprise and other economic development programs to create work opportunities in rural Oregon producing hardy fire-resistant xeric green ground covers that would be available to residential landowners within their economic capacity.

Keep Oregon green!

-Work across all state regulatory agencies to develop a culture of respecting the right to equal treatment and mutual regard for non-urban dwellers in rural Oregon. Their relative number may be shrinking against the growth of urban areas, but they are an integral part of the population from Oregon's beginnings as a state. They foster the forestlands that provide essential ecosystem services urban areas depend on.

And remember, not everyone is suited to living crowded together in a town or city. Think of who you would be willing to share your shower with should your actions when implementing this well-intended program result in depopulation of rural areas. These folk might end up in line outside your bathroom door.

Sincerely, for the public at large in Josephine County,

Tara Lowrance-Mattis
Up the Creek Ranch
621 Speaker Road
Wolf Creek 97497
(541) 659-5531
upwolfcreek@gmail.com

cc:
State Fire Marshal
PUC
ODOT
Oregon's Forester
Secretary of State
SB 762 Legislators
Governor
Governor



Public Forum 9/3/2024 Comment Attachment 2

1 message

T L- Mattis <upwolfcreek@gmail.com>
To: T and L Mattis <upwolfcreek@gmail.com>

Mon, Sep 23, 2024 at 7:20 AM

Public Forum 9/3/2024 Comment Attachment 2

The Parable of the Shade Tree

There are physical elements present in most rural homes in forested areas of Oregon that were not accounted for by the committees, the Fire Marshal, or the Dept. of Forestry when developing the defensible space codes rural residences. Had real public engagement of the people who do live in these homes had occurred, they would have pointed out much earlier in the process that certain space requirements are impractical to the point of creating a public health hazard as the code stands now.

And now that the codes and process have been finalized, it up to the Board of Forestry or the legislators to determine the importance of these elements in light of the failure to truly engage these stakeholders who will now be forced to choose between their own health and the short-sighted codes they should conform with, should they fall under the scrutiny of the Fire Marshal or county planning and code enforcement departments.

These elements include:
a.) Increased temperatures outside of and within residences due to increased thermal exposure once vegetation proximal to the home is removed. In SW Oregon, temperatures inside exposed forest homes will be increased to dangerously high levels. Most homes here don't have air conditioning units, the shade directly over the home and the surrounding lot/yard provided protection from such high temperatures. People will need to install something to mitigate both extremes in temperatures caused by the removal of surrounding vegetation.

See the clippings from the Washing Post cited below.

This leads to a second element, n). The homes' electrical systems. Most residences in the WUI were constructed in an age when there was much less use of electric appliances and are not be wired for the much greater demand created by cooling systems. These homes may become unlivable without an expensive electrical upgrade. Such upgrades are unaffordable to most families here. Even solar power development is subsidized through tax rebates they won't get because they don't have that much income.

Improving home insulation alone will not provide for these homes liability after a few days of the extremes of heat seen every summer in SW Oregon. Residents will need to generate some form of interior cooling to maintain livable conditions inside the home.

Please apply this knowledge to your future analyses and planned implementation of vegetation management codes for defensible space in SW Oregon's hot environment. They make an important point about the risk to people's lives in the unmitigated extreme heat in homes lacking insulation, air conditioning, and SHADE.

It was recently published through by a very reputable publication, which included a clear description of the peer-reviewed models and data for accuracy in their reported findings.

Here is an example taken from a Washington Post article discussing the dangers to human health resulting from exposure to extreme heat in homes without air conditioning. While the article centers on Houston during a power outage, the temperatures they modeled the situation on now occur annually in the Rogue Valley.

Note the importance of tree shade over the home in mitigating this danger.

* "Once the power is out, some homes withstand the heat better than others. With modern insulation and shade from trees, a single-family home could stay at around 80 degrees even if the outside temperature is a scorching 99 degrees."
<See first attached image>

* "A similarly sized home without insulation that is fully exposed to the sun will heat up until the temperature is virtually the same as outside."
<See second attached image>

* "By the third day, the body begins to collapse under the strain of relentless heat. "After about 36 to 48 hours, you really see the human body break down," Klinenberg said. "Health problems start to accumulate."

The body can withstand even severe temperatures for a short time. Sweat glands push salty liquid to the surface of the skin, where it evaporates, cooling the body. The heart pumps faster, circulating blood away from the warm center of the body and toward the cooler extremities. Depending on health, fitness and humidity, even eight to nine hours daily in sweltering heat is tolerable provided one can spend the night in cooler, ideally air- conditioned temperatures."

* Images clips and quotes are from The Washington Post "The disaster no major U.S. city is prepared for"

By Nikog Kommenda, Shannon Osaka and Simon Ducroquet

Published online September 13, 2024 at 2:00 a.m.

Downloaded September 14

- Access this article to confirm the solid peer-reviewed scientific basis for the modeling used to describe how a well-insulated home with partial shade compares to the poorly insulated home exposed to full sun. Given the condition of local forest homes, the latter will be the result from the codes just adopted by the Defensible Space in the WUI program.

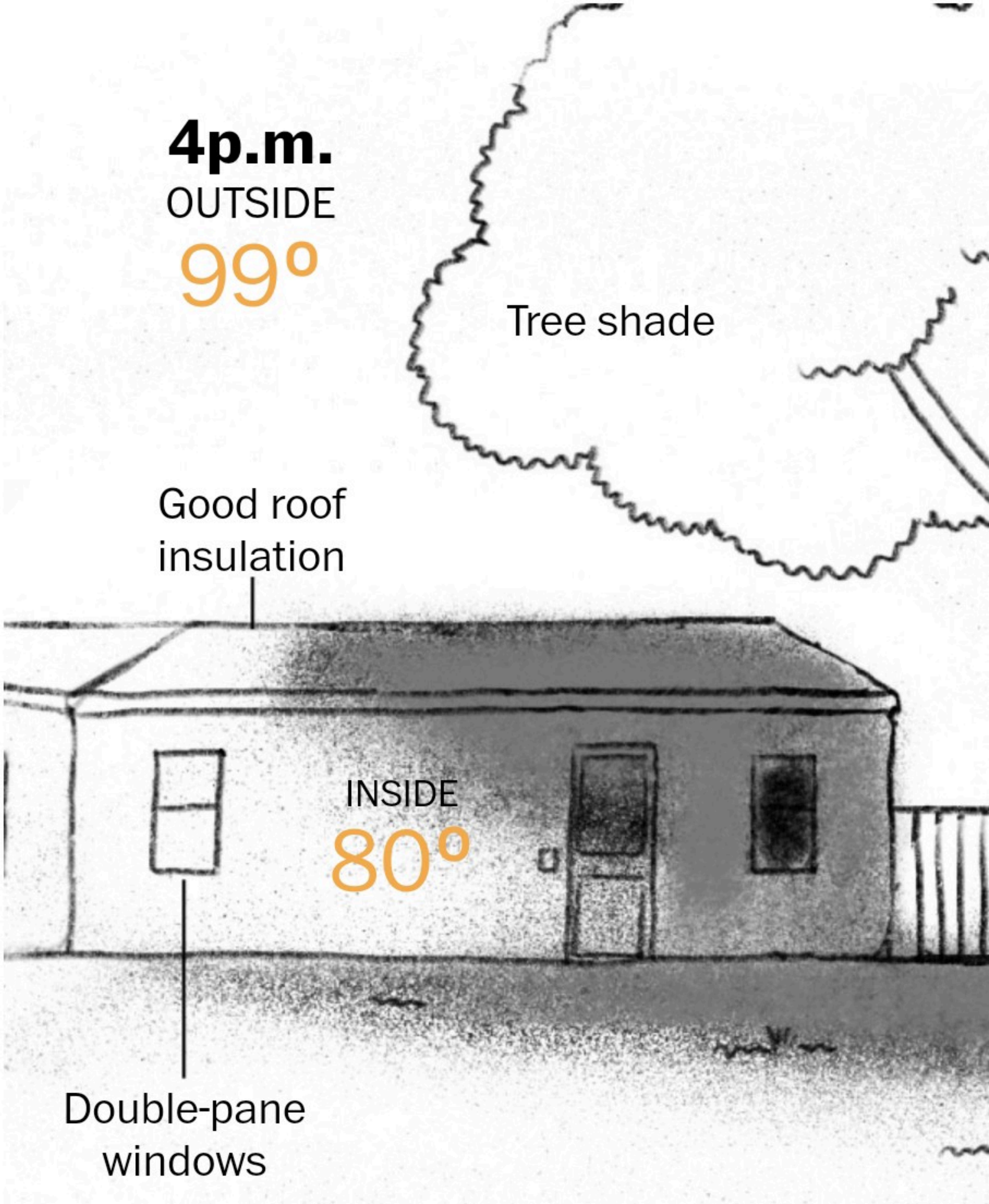
4p.m.
OUTSIDE
99°

Tree shade

Good roof
insulation

INSIDE
80°

Double-pane
windows



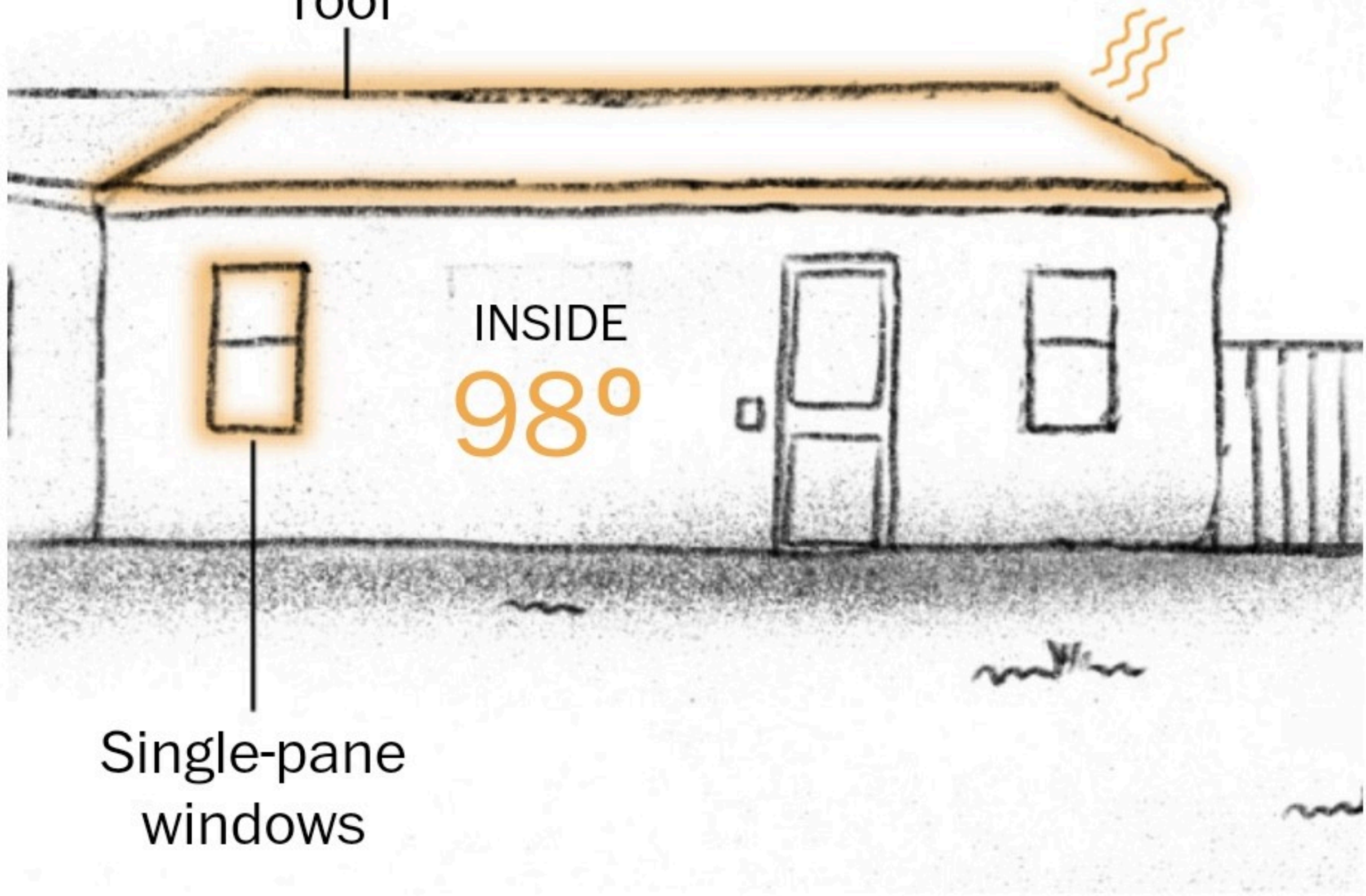
4p.m.
OUTSIDE
99°

Poorly insulated
roof

Air leaks

INSIDE
98°

Single-pane
windows





Board of Forestry Public Meeting

Item 4: Department Financial Report for June, July, August 2024

The Board of Forestry received 1 submission for written testimony on Agenda Item 4.

This is an information item.

To: Oregon Board of Forestry

From: Scott Killops

Subject: Public Comment for the Board of Forestry Meeting on September 4-5, 2024
Regarding the ODF 2025-27 ARB and Resource Requirements of the CCCP

Date: September 11, 2024

Thank you for the opportunity to provide a public comment for the Board of Forestry (Board) meeting on September 4-5, 2024. My comment regards the [ODF 2025-27 Agency Request Budget \(ARB\)](#) and the resource requirements of ODF's [Climate Change and Carbon Plan \(CCCP\)](#).

The [Vision for Oregon's Forests \(Vision\)](#) includes the Climate Leadership goal, "The Board and Department will build capacity for climate-smart leadership." Presumably this will require additional resources. In fact, ODF's [Climate Change and Carbon Plan \(CCCP\)](#) includes a section on "barriers that may slow the adoption of climate-smart forestry in the state". The very first barrier listed is "Limited staffing capacity" with the proposed resolution "Pursue additional positions and capacity through Policy Option Packages, legislative funding". However, the [ODF 2025-27 Agency Request Budget \(ARB\)](#) does not mention the CCCP and appears to include no resource requests for the CCCP's implementation. If CCCP implementation is fully funded, that's great news. If not, ODF should create a Policy Option Package articulating the resources required for CCCP implementation so that legislators can consider it and supporters can advocate for it.

Some Board members may object that the Board has not yet discussed the strategies included in the Vision, so it's premature to make work plans and resource requests. In the case of the Climate Leadership priority, the strategies included in the Vision are literally a restatement of the Climate-Smart Forestry Goals included in the CCCP. The CCCP was approved by the Board in November 2021, not November 2023 as the Vision incorrectly states, following a [public comment period](#). This was followed by the creation of the Board Work Plan [Climate Change and Forest Carbon Work Plan 2022-2024](#) in March 2022. Additional Board deliberation should not be required to assess any resource gaps associated with implementation of the CCCP.

As we approach the third anniversary of the approval of the CCCP, it will be a real shame if implementation is delayed further because needed resources are not requested in the ODF 2025-27 ARB and/or associated Policy Option Packages.

Thanks again for the opportunity to provide a public comment for this Board meeting and for all the hard work that the Board and ODF perform on behalf of all Oregonians.

Respectfully,
Scott Killops
350PDX Forest Defense Team Member



Board of Forestry Public Meeting

Item 5: Vision for Oregon's Forests

The Board of Forestry received 1 submission for written testimony on Agenda Item 5.

This is a decision item.

To: Oregon Board of Forestry

From: Scott Killops

Subject: Public Comment for the Board of Forestry Meeting on September 4-5, 2024
Regarding Agenda Item 5 – Vision for Oregon’s Forests

Date: September 7, 2024

Thank you for the opportunity to provide a public comment for the Board of Forestry (Board) meeting on September 4-5, 2024. My comment pertains to Agenda Item 5, Vision for Oregon’s Forests.

The [*Staff Report for Agenda Item 5, Vision for Oregon’s Forests*](#), states:

“Some Board members and public commenters have noted the lack of measurable objectives in the Vision for Oregon’s Forests. Without this component, the Vision cannot serve as a functional strategic plan. With the clearer articulation of the purpose of the Vision

1. The Department recommends the Board creates a short-term workgroup with Board and Department representation to determine whether it is necessary to establish overarching, observable and measurable outcomes associated with the goals of the Vision for Oregon’s Forests for use in tracking the Board and Department’s alignment with their stated shared vision. The workgroup would bring its recommendation to the full Board at its January 2025 meeting.

NEXT STEPS

With Board adoption, Attachment 1 will undergo design and publishing work, with the final design shared with the Board at the October retreat before being posted to the Board’s website. The Department will continue with rollout planning to guide the sharing of the Vision with the agency as a whole.”

I would just like to point out that the Vision has already been published as the “ODF 2025-2030 Strategic Plan” in the [*ODF 2025-27 Agency Request Budget*](#), pages 35-41. However, this version does state:

“Throughout the remainder of 2024 and into 2025, the board and department will continue to build upon the foundation provided by the Vision for Oregon’s Forests, including development of objectives and performance/progress measures. Once that work is complete, department leadership will begin their work of ensuring alignment between strategy and operations.”

Thanks again for the opportunity to provide a public comment for this Board meeting and for all the hard work that the Board and ODF perform on behalf of all Oregonians.

Respectfully,
Scott Killops
350PDX Forest Defense Team Member



Board of Forestry Public Meeting

Item 8: Legislative Report on Private Forest Accord Implementation

The Board of Forestry received 3 submissions for written testimony on Agenda Item 8.

This is a decision item.



Public Comment, PFA Legislative Report, Board of Forestry Sept 4, 2024

Good afternoon, Chair, Members, and state forester Mukumoto. For the record, my name is Casey Kulla and I coordinate forest policy for Oregon Wild. I am a member of the Board of Forestry's Adaptive Management Program Committee and thus a public official. I declare a potential conflict of interest, as my testimony represents an official act and may result in a monetary benefit to me.

Thank you for the opportunity to comment today on the Legislative Report on the Private Forest Accord.

First, I'd like to commend the Forest Resources staff for implementing a massive number of new rules in the past year, including technical guidance and training.

Second, I'd like to add some details to the checklist you've been provided.

- The Small Forestland Owner Investments in Streamside Habitat has awarded the first \$6 M to open 75 miles of fish-bearing habitat, removing culverts in 24 watersheds in 19 counties. This represents so much hard work by Josh Hanson, so much trust by small forestland owners, and a whole lot of future fish.
- ODFW's PFA grant program awarded \$10M for 25 high-priority habitat restoration projects across Oregon. This represents tremendous work by ODFW staff and leadership, tremendous work by the advisory committee members like Chrysten Rivard and Chad Washington (sorry Heath), and so much trust by the folks who will do the very important work.
- The administrative draft habitat conservation plan was submitted to the Federal Services this summer. While ODF is the applicant, coordinated successfully by your own Jennifer Weikel, achieving this major milestone was possible because of the work of the team: PFA Authors like Seth Barnes, Dave Bechtold, Stacey Detwiler, Sean Stevens, and Rick Zenn, ODF staff like Jason Miner, the excellent facilitators at Willamette Partnership (we miss you, Sara O'Brien), and the technical advisors at ICF. We expect a comprehensive response from the Services this fall, and I hope it helps you finalize your post-disturbance logging rules.

- The adaptive management program is steadily moving towards a research agenda with coordination by Emily Martin and Terry Frueh and lots of struggle and collaboration by members of the AMPC and IRST.
- At ODFW, the fish presence survey methodology is getting a thorough update.
- Early conversations and information gathering is happening on tethered logging rule making.

Third, under your Resilient Forests category in the Vision for Oregon Forests, you promise to: “Engage in the development of safe harbor agreements, habitat conservation plans, and other regulatory compliance mechanisms in collaboration with landowners and state and federal agencies.” You’ve had requests for specific shout-outs to the Western Oregon State Forest, Elliott State Research Forest, and the PFA habitat conservation plans. I agree: please include these HCPs. This is your policy document. Declare them policy priorities.

Finally, you saw a 2025-2027 budget that zeroes out adaptive management (\$6M) and SFISH (\$10M). Is this a policy priority for you? These programs are integral to the success of the Forest Practices Act and are commitments of the legislature in SB 1501. Crucially, your team represents these programs as commitments to the federal Services in the HCP.

I know the limitations the Governor gave your budget team. I also know that other policy-making bodies have asked the Governor to add back the items that they couldn’t include. And, other agencies included program areas in their budgets—despite the guidance—precisely because they were priorities. Is the PFA a priority for you? I hope you decide it is and tell the Governor.

To: Oregon Board of Forestry

From: Scott Killops

Subject: Public Comment for the Board of Forestry Meeting on September 4-5, 2024
Regarding Agenda Item 8 - Legislative Report on Private Forest Accord Implementation

Date: September 4, 2024

Thank you for the opportunity to provide a public comment for the Board of Forestry (Board) meeting on September 4-5, 2024. My comment pertains to Agenda Item 8, Legislative Report on Private Forest Accord Implementation.

The [Private Forest Accord Implementation: 2023 Progress Report](#) prepared by ODF for approval by BOF appears to fulfill the letter of the law as required in [SB1501](#). However, it falls short of the spirit of the law by failing to call out the gap that exists in the [ODF 2025-27 Agency Request Budget \(ARB\)](#) for implementation of the Private Forest Accord (PFA). It is worth quoting the ARB (page 279) on this point:

“SB 1501 (2022) directed these actions to support the development of the Private Forest Accord (PFA) Habitat Conservation Plan (HCP) and the pursuit of incidental take permits (ITPs). However, the Legislature has not provided permanent funding for the Adaptive Management Program Committee (AMPC) and Independent Research and Science Team (IRST) activities or Small Forestland Investment in Stream Habitat (SFISH) grants which are key strategies in the PFA HCP.

The AMPC and IRST are integral to the Adaptive Management Program and help ensure resource objectives are met and the best available science is applied to decision making. The AMPC sets the research agenda, assesses scientific findings, assists the Board of Forestry in identifying and modifying resource objectives, and submits recommendations to the Board related to forest practice rules, guidance and training. The IRST conducts and oversees research and reports scientific findings to AMPC and the Board. Funds are needed to support the research agenda as well as participation grants. SFISH grants are made available to qualified small forestland owners to replace fish stream culverts, repair abandoned roads and improve or relocate roads that pose hazards to fish-bearing streams. Failure to provide SFISH grant funding will dramatically decrease the likelihood of fish habitat improvement on these lands.

To be successful in its endeavor to secure approval of the PFA HCP and associated ITPs for landowners, Oregon will need to demonstrate stable funding for the programs and strategies necessary to support the HCP. Per SB 1501 (2022), if ITPs are not secured by December 31, 2027, the revisions to the FPA and forest practice rules are to be repealed per the specified protocol. Biennially, \$6 Million is needed to fund the AMPC and IRST activities and \$10 Million is needed to fund SFISH grants to fulfill Oregon’s PFA commitments.”

It baffles me why ODF would not include these three paragraphs from the 975 page [ODF 2025-27 Agency Request Budget \(ARB\)](#) in the 1 page [Private Forest Accord Implementation: 2023 Progress Report](#) to the Oregon Legislature. This budget gap represents a key program risk and the legislators are the decision makers who will decide the ODF 2025-27 Biennium Budget. ODF is missing an opportunity with this PFA progress report to proactively notify the legislature of a key dependency for the upcoming legislative session.

Thanks again for the opportunity to provide a public comment for this Board meeting and for all the hard work that the Board and ODF perform on behalf of all Oregonians.

Respectfully,

Scott Killops

350PDX Forest Defense Team Member



Chair Jim Kelly
Oregon Board of Forestry

September 4, 2024

RE: Public Comments on Agenda Item 8: Legislative Report on Private Forest Accord Implementation

Chair Kelly, Board Members, and State Forester Mukumoto:

Thank you for the opportunity to provide comments on Agenda Item 8: Legislative Report on Private Forest Accord Implementation. The Wild Salmon Center is a nonprofit organization based in Oregon that works to protect and restore healthy forests and abundant clean water to support thriving wild salmon populations in the state and across the Pacific Rim. The Wild Salmon Center is one of the Private Forest Accord Authors as part of the conservation coalition and has engaged in this process from the beginning in 2020.

Over the next year, Oregon has the opportunity to secure the wins of the Private Forest Accord (PFA) for the long haul to ensure more certainty for forest landowners and improved protections for clean water and fish. Without a federally approved Habitat Conservation Plan (HCP) by December 31, 2027, all of the changes under the PFA roll back.

To demonstrate Oregon's commitment to achieving a federally approved PFA HCP, the state must fully fund critical programs that support that approval (\$36M).

Specifically, the state must fund \$36M in total needed by the Oregon Department of Forestry (ODF) and the Oregon Department of Fish and Wildlife (ODFW) in the 2025-2027 biennium. This includes the following:

\$16M needed for ODF: Adaptive Management Program and SFISH Grant Program

- **Full funding for the Adaptive Management Program at ODF established in the base budget (\$6M per biennium):** The Adaptive Management Program is a foundational component of both the new rules and the HCP that establishes a process to evaluate the effectiveness of the new rules in meeting biological goals and objectives and determine if policy changes are needed. In the 2023-2025 biennium, the Adaptive Management Program was underfunded at \$4M in an ODF POP. Continuing to underfund this program will make it challenging to conduct the research necessary to assess the effectiveness of the rules and meet the standards of an approvable HCP. Ongoing budget shortfalls for this program will also make it challenging to recruit and retain qualified expert stakeholders to participate in both the Adaptive Management Program Committee

INTERNATIONAL HEADQUARTERS

721 NW Ninth Avenue, Suite 300 • Portland, Oregon 97209 USA • tel: 503.222.1804 • fax: 503.222.1805

info@wildsalmoncenter.org • www.wildsalmoncenter.org

(AMPC) and the Independent Research and Science Team (IRST). This program is essential to achieving a collaborative, science-driven, and less contentious process for considering future rule changes.

- **Full funding for Small Forestland Owner Investment in Stream Habitat (SFISH) Program at ODF established in the base budget (\$10M per biennium):** The PFA included new resources for small forestland owners, including the SFISH program that provides grants to small forestland owners to replace or upgrade culverts and stream crossings. Ongoing investment in this program is a core component of the PFA's new requirements to provide increased technical and financial assistance to small forestland owners, particularly as the new rules are now in effect. The SFISH Program was underfunded at \$6.67M in an ODF POP in the 2023-2025 biennium. Continuing to underfund this program will limit the technical and financial assistance available to small forestland owners as the new rules are implemented.

\$20M needed for ODFW: PFA Mitigation Grant Program

- **Full funding for the Mitigation Program established in the base budget (\$20M per biennium):** The Mitigation Program established under the PFA provides dedicated grant funding for fish passage barrier removal, stream habitat restoration, and other mitigation projects. The PFA commits \$10M from the state and \$2.5M from industry annually for this fund until federal approval of an HCP, after which the industry contribution increases to \$5M annually. SB 1501 appropriated \$10M to ODFW for the Mitigation Program and the remaining \$10M was included in an ODFW POP in the 2023-2025 budget. The Mitigation Program and the long-term investments needed to keep it functioning are core components of the negotiated agreements under the PFA authorized in SB 1501 and updated rules, as well as the HCP that the state will submit to the Services in 2024. In the 2025-2027 biennium, full funding at \$20M for the Mitigation Program in the base budget is critical to support the success of the PFA and finalization of the HCP.

These programs at ODF and ODFW are not currently included in the base budget, but they are foundational to the success of the HCP and ensuring federal approval. Through the Private Forest Accord, the state moved out of decades of gridlock around logging on private forest lands. We can't afford to go back to fights at the ballot box, expensive lawsuits, and painstaking progress to protect healthy forests and clean water. We thank the Board for your support for the PFA process and ask that you support full funding for these programs in this critical window of time before 2027 to shore up efforts for federal approval.

Additional Milestones in 2024 to Support Federal Approval of PFA HCP and PFA Implementation

Significant work and progress has been made to implement the changes under the Private Forest Accord, from the passage of bipartisan legislation (SB 1501) in March 2022 to approval of new rules in November 2022. We appreciate the hard work of the Oregon Department of Forestry (ODF) staff, as well as partner agencies including Oregon Department of Fish and Wildlife (ODFW), to finalize new rules, develop trainings, and begin implementation.

The legislative report included in the Board packet under Agenda Item 8 covers a number of key milestones achieved in 2023. In addition to these achievements, we want to highlight additional work and important outcomes achieved to date in 2024 that are critical to meeting the 2027 deadline for federal approval of a PFA HCP.

- **\$10M awarded in first-ever round of PFA Grant Program:** The Private Forest Accord Mitigation committee through Oregon Department of Fish and Wildlife (ODFW) successfully awarded \$10M to restoration projects across the state in its inaugural round of funding.
- **\$5M awarded to small forestland owners under first round of SFISH program:** This new grant program established under the PFA awarded \$5M to small forestland owners to 20 projects across the state. These projects are anticipated to open up more than 74 miles of habitat for native salmon and trout by replacing or removing 37 culverts across 19 watersheds. In the 2023-2025 biennium, the SFISH program received \$6.67M which was less than the \$10M needed to fully support the program and ensure technical and financial assistance to small forestland owners under the new rules.
- **Full suite of new rules went into effect January 1, 2024:** As of January 1, 2024, the full suite of rules modified under the PFA went into effect. This represents a significant effort from ODF, ODFW, the Governor's office, and all of the PFA Authors to draft, finalize, approve, and fully implement the rule changes negotiated under the Accord. We thank the Board for your support to finalize these rules and ODF staff for their hard work to meet these commitments.
- **Final draft of PFA Habitat Conservation Plan (HCP) submitted to NOAA and USFWS:** On July 15, the state submitted a comprehensive draft of the PFA HCP to NOAA and USFWS. Completion of this draft is a critical milestone to achieve federal approval by 2027. We expect initial feedback from the Services by October 2024 that will inform any adjustments before the public NEPA process begins (anticipated early 2025).
- **Adaptive Management Program Committee (AMPC) and Independent Research and Science Team (IRST) operational:** Both the AMPC and IRST have held a series of meetings, including a joint meeting in January, to work through the first cycle of adaptive management questions required by statute as well as additional priorities identified by the AMPC. To date in 2024, these prioritized research topics include specific questions around forest roads and hydrologic connectivity, a literature review on eastern Oregon steep slopes, amphibians, and effectiveness monitoring for the PFA Habitat Conservation Plan (HCP). Both of these committees fall under the broader Adaptive Management Program established as a new process under the PFA to assess the effectiveness of the new rules in meeting biological goals and objectives.

Thank you for the opportunity to provide more detailed comments regarding Agenda Item 8: Legislative Report on Private Forest Accord Implementation.

Sincerely,

Stacey Detwiler
Oregon Policy Director
Wild Salmon Center