

- Having both processes running concurrently has risks. With the understanding that adopting a new FMP is critical to restoring ODF's financial health, there is a fear the BOF will be forced to agree to a less than favorable HCP simply to secure "permission" to adopt a less than favorable Forest Management Plan. If we can anticipate this dynamic now, the federal negotiators can see it also.
- We're also concerned about what happens when it is time to take the HCP through NEPA. A "wide range of alternatives" including a "no-action" alternative will be explored.
 - The No-action alternative would question what would happen in absence of the proposed action. What would be suggested for the no-action alternative – a departure?

Preparing alternative Forest Management Plans concurrently with the HCP might avoid this showdown. Alternative FMPs would show the federal negotiators what would happen if they fail to negotiate an acceptable HCP. And, the alternatives will allow ODF to finalize a Forest Management Plan in a timely manner, if the HCP effort fails.

There are other approaches to maintaining the economic value of the State Forest Trust Lands that would form an analytical basis of alternatives to be developed. They are:

1. A departure from even-flow that would accelerate harvest of older stands.
2. Returning to the Counties a portion of the State Forest Trust Lands in an effort to capture their economic value.
 - We offer this alternative because we believe that implementing an even-flow forest plan under take avoidance is not a viable alternative as it will not maintain the value of the asset.

We are pleased to learn that Phase 1 of the HCP analysis will include an independent economic analysis of revenues and costs. This analysis should compare the revenues and costs of:

- A State Forest Management Plan with an HCP.
- A State Forest Management plan with a departure from even-flow that minimizes the acres that grow into habitat attractive T&E species utilizing take avoidance so long as the economic value of the asset is protected.

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