



State Forest Management Plan – Habitat Conservation Plan

Comment by Rex Storm, Associated Oregon Loggers, Inc.
before the Oregon Board of Forestry – November 8, 2018

Chair Imeson and Board members, my name is Rex Storm, Certified Forester and Forest Policy Manager for Associated Oregon Loggers (AOL). I make these comments on behalf of the 1,000+ AOL member companies, representing logging, transportation, construction, reforestation, improvement, protection, and allied forest management businesses working in Oregon. AOL member companies are the forest professionals who provide services to manage public and private forestlands on a contract basis, including Northwest Oregon's state forests. These companies may also purchase state forest timber-sale contracts. The revision of the forest plan/proposed habitat conservation plan are of critical concern to our work.

We are becoming increasingly dissatisfied with the Board and Department's exploration process intended to pursue development a future Habitat Conservation Plan (HCP) with the federal regulating agencies—US Fish & Wildlife Service (FWS) and NOAA Fisheries Service (NOAA-F).

We experience that our interests and concerns are being discounted, and that the Phase One assessment has failed to sufficiently address the full weight of foregone timber value and revenue production value of the State Forest asset under presumed and unknown future demands of the FWS and NOAA-F.

- 1. I concur with those remarks today made by my peers representing Oregon Forest & Industries Council and Stimson Lumber Co.**
- 2. We disagree with the validity of the assumptions made in the October 2018 HCP 'Business Case Analysis.'**
 - The document focuses on presumed administrative cost savings, while also weakly presuming a set of unknown and un-proven future demands of the FWS and NOAA-F decisions. Past HCP negotiation experience by ODF and other forest landowners with FWS and NOAA-F has proven such preliminary presumptions to be fleeting and discounted from subsequent regulator demands. We do not agree with the key findings about relative numbers stated for available acreage or annual harvest revenue.
- 3. As engaged forest professional partners, the forest sector (we) are unsatisfied with our being excluded from phase one of the HCP assessment.**
 - Your forest partners have considerable experience and expertise in managing forests, habitats, and federal regulators that would be of value to improve the Board's/Department's future ESA and species management plans. We have more to offer than simple relegation to being labeled as "publics" or "stakeholders." We feel disenfranchised and it is unclear how we would be engaged in phase two.

4. **This plan—especially under presumed HCP assumptions— appears to cause the growing and harvesting greater numbers of older-larger trees, which would be fraught with many costly pitfalls not assessed in the *Business Case Analysis*.**
 - For these older-larger trees, our experience urges that you please beware of future higher operational costs and lower log values, as a future unintended (and heretofore unconsidered) decrease in state forest revenue and increased species-driven forest restrictions.

5. **The HCP objectives of federal regulators by-definition demands the wrong-headed singular species-centric focus on individuals and their sole habitat—to the known detriment of all other native species and habitats in the ecosystem. This singular species preeminence contradicts the Board’s state forest Greatest Permanent Value mandate.**
 - HCP negotiations with the FWS and NOAA-F would necessarily steer towards outcomes that would contradict the Board’s state forest Greatest Permanent Value mandate—an imprudent direction to pursue. This HCP-proposed singular species-centric bias wrongly discriminates against the majority of the state forest native species and habitats. What about those important habitats for those vital hundreds or thousands of other plant, fish and animals that are not ESA-listed? The HCP Business Case Analysis failed to address the many pitfalls reasonably predictable to transpire under future HCP negotiations with federal regulators who function under exclusively different mandates than does the Board.

In closing, I urge the Board’s reconsideration of our stern reservations about proceeding beyond phase one assessment of HCP exploration. Thank you for your consideration.