



Associated Oregon Loggers, Inc.

PO Box 12339 • Salem, Oregon 97309-0339 • (503) 364-1330
Fax: (503) 364-0836 • aol@oregonloggers.org

Date: January 3, 2024
To: Board of Forestry
From: Amanda Sullivan-Astor, Forest Policy Manager
Associated Oregon Loggers

Topic: Agenda Item #2 – Public Comment

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

For the record, my name is Amanda Sullivan-Astor. I am the forest policy manager for Associated Oregon Loggers.

It's undeniable that the Habitat Conservation Plan (HCP) holds noble intentions in protecting our diverse ecosystems. Yet, we implore you to consider the profound impact this plan has on the very heartbeat of our communities - the hardworking individuals and families who have dedicated their lives to sustainably managing our forests.

Abraham Lincoln once said, "I like to see a man proud of the place in which he lives. I like to see a man live so that his place will be proud of him." Loggers, mill workers, foresters and others connected to this sector embody this sentiment wholeheartedly. Our forests and the hardworking individuals who tend to them shape the essence of our communities. The looming threat to their existence, posed by an unamended HCP, bears the potential to erode not only the verdant canopies of our woodlands but also the vibrant tapestry of our society. It is in the crucible of these pivotal moments that our character and moral fiber as a society is tested.

Thus, our message is crystal clear: If the draft HCP is approved without essential amendments we advocate for, the repercussions shall be nothing short of devastating for the forest sector, the very lifelines of community services, and the hardworking individuals who depend on work in state forests to sustain their livelihoods and fortify family and rural economic stability.

The urgency of this matter cannot be overstated. The reduction in timber volume and revenue has already begun – it started last summer! The Oregon Department of Forestry (ODF) has chosen to implement the HCP even before its finalization, resulting in a staggering 17% reduction in volume and a 24% reduction in revenue compared to just last year, with the potential for a long-term 34% reduction.

These reductions have far-reaching implications, affecting counties, taxing districts, and even ODF's own staff. ODF acknowledges that a budget reduction could impact their firefighting capabilities, putting our communities at risk while doing less increases fuel on the land.

Environmental justice means ensuring that the burden of environmental decisions doesn't fall disproportionately on the shoulders of rural communities and small businesses. It means finding solutions that protect both the ecosystems and the people who rely on them for survival. We urge you to remember the families who depend on these forests for their daily bread, for their children's education, and for the stability of their communities.

We implore you to use the extended timeline provided by the Revised Implementation Plans, the Coho Settlement, the Stewardship Agreement to conduct thorough impact assessments that consider the well-being of all stakeholders. Let's work together to find a path forward that preserves our cherished

"Growing service & voice for loggers and forest operators since 1969"
www.oregonloggers.org



Associated Oregon Loggers, Inc.

PO Box 12339 • Salem, Oregon 97309-0339 • (503) 364-1330
Fax: (503) 364-0836 • aol@oregonloggers.org

environment while safeguarding the dignity, livelihoods, and futures of the hardworking loggers and small business forest operators ODF and all Oregonians rely on.

In the spirit of Dr. Martin Luther King Jr., who implored us to 'have the courage to face the uncertainties of the future,' let us summon the courage to amend this plan, to ensure that it honors its noble intentions without forsaking the livelihoods of those who have dedicated their lives to the responsible stewardship of our forests. In doing so, we shall forge a future where conservation and community prosperity stand hand in hand, a testament to our commitment to justice, compassion, and the well-being of all those who call our forests home.

Thank you and please see our written comments for more specifics about our identified issues and recommended solutions.

Sincerely,

Amanda Sullivan-Astor
Associated Oregon Loggers
Forest Policy Manager
aastor@oregonloggers.org

Attachment: HCP Issues and Recommendations



Associated Oregon Loggers, Inc.

PO Box 12339 • Salem, Oregon 97309-0339 • (503) 364-1330
Fax: (503) 364-0836 • aol@oregonloggers.org

Issues and Recommendations

Table of Contents

Take Avoidance Strategy.....	1
Ecological Considerations	1
Monitoring and Adaptive Management	2
Sustainability of Counties and Economic Implications	2
Collaborative Stakeholder Engagement.....	3
Conclusion	3

Take Avoidance Strategy

The take avoidance strategy, as outlined in the business case analysis, has been a point of contention. While it offers immediate conservation benefits, there are concerns about its long-term sustainability and the potential for negative economic impacts. In light of the recent developments, it is crucial to reevaluate the risks associated with this strategy.

Solution: Reassess the Take Avoidance Strategy

Robust data analysis and modeling should be conducted to assess whether the risks outlined in the initial analysis still hold true, and if so, how they can be mitigated. The reevaluation of the take avoidance strategy should involve a comparative analysis of alternative approaches. We believe ODF should explore case studies of regions where similar strategies were implemented and assess their long-term consequences. Determine whether there are adaptive management techniques that can enhance the sustainability of the strategy.

Ecological Considerations

The ecological aspect of the HCP is central to its success. Habitat conservation plays a pivotal role in protecting Oregon's diverse wildlife yet it is not ODF's responsibility to recover listed species.

Solution: Use Evidence-Based Decision-Making to Assess the Real Species Benefits of Habitat Reserves Across Oregon for Covered Species

ODF must rely more on evidence-based decision-making by conducting thorough analyses of the potential impacts of the HCP. We believe ODF must incorporate more research on active forest management's benefits for wildlife considering the wholistic ecosystem benefits of doing more and the negative externalities of doing less into their decision-making methodology. This can help strike a balance between conservation and economic interests. As outlined in the County Alternative, the evidence is clear that locking more land up is not going to protect or enhance many of the covered species' populations. Please use more evidence is crafting an amended HCP.



Associated Oregon Loggers, Inc.

PO Box 12339 • Salem, Oregon 97309-0339 • (503) 364-1330
Fax: (503) 364-0836 • aol@oregonloggers.org

Monitoring and Adaptive Management

An integral part of the HCP is the incorporation of monitoring and adaptive management. The success of the plan depends on the ability to adjust strategies based on real-time data. Detailed research into monitoring methodologies, cost-effectiveness, and their impact on decision-making is imperative.

Solution: Committed Monitoring and Adaptive Management

The HCP should integrate robust monitoring and adaptive management practices to respond to changing conditions and emerging data. ODF must regularly assess the effectiveness of conservation measures and be prepared to adjust strategies accordingly. In the end ODF must evaluate the effectiveness of adaptive management in achieving both conservation goals and socioeconomic stability.

Sustainability of Counties and Economic Implications

The economic implications of the HCP extend beyond job losses in the logging industry. It affects the entire economic ecosystem of trust counties.

Some argue that the current funding mechanism for local budgets with timber dollars is outdated. However, wood remains the most environmentally friendly building material, with growing global demand. The problem doesn't lie in the model; it lies in the excessive costs imposed by this HCP.

Even if alternative public funding could partially offset the losses, it won't compensate for the jobs and economic activities tied to logging, hauling, and milling timber from state forests. For every million board feet (MMBF) harvested, approximately 11 jobs are created however this number doesn't account for the jobs produced from service work and other types of contracting. It also relies heavily on implant modeling which completely ignores proprietorships and the entirety of the disaggregated forest contract sector. Furthermore, every \$1 million spent on stumpage generates an additional \$1.41 million in economic activity for underserved rural economies.

The proposed HCP will cost counties billions in direct and indirect revenues over the next 70 years and severely reduce timber supply in Northwest Oregon for generations.

Further research into the economic effects, especially on rural communities, is essential. Drawing lessons from the federal SRS payments, it is clear that an unreliable funding source can lead to significant challenges for schools, communities, and law enforcement.

Solution: Development of an Economic Case Study of Communities That Have Had Similar Reductions in Timber Harvest Due to Species Concerns

To underscore the potential challenges faced by communities, we would like ODF to consider an in-depth case studies of regions and/or counties that have struggled due to funding uncertainties or have undergone similar transitions. We think ODF should examine the economic, social, and environmental impacts over several years, and draw lessons from their experiences and can provide valuable insights into potential pitfalls.



Associated Oregon Loggers, Inc.

PO Box 12339 • Salem, Oregon 97309-0339 • (503) 364-1330
Fax: (503) 364-0836 • aol@oregonloggers.org

Collaborative Stakeholder Engagement

Stakeholder engagement is vital to the success of the HCP. Although ODF claims there has been ample stakeholder engagement, no meaningful changes have been made to address concerns by those most affected by these decisions. Establishing mechanisms for ongoing dialogue and cooperation can help build trust and ensure that the plan is well-informed and adaptable.

Solution: Enhance True Collaborative Opportunities

The Oregon Department of Forestry and the Board of Forestry should prioritize transparent and inclusive decision-making processes that involve all stakeholders.

We believe ODF should analyze successful models of collaboration between government agencies, businesses, communities, and conservation groups. ODF should investigate how transparent and inclusive decision-making processes can build trust and support for the plan using environmental justice strategies to ask community members and staff most impacted and most knowledgeable about these forests about how best to balance the diverse goals originally outlined to the Board of Forestry.

Conclusion

The Oregon Habitat Conservation Plan stands as a pivotal initiative, striving to safeguard the state's unique ecosystems while tending to the diverse needs of its stakeholders. It is a delicate dance of conservation and socioeconomic stability that requires the utmost diligence and care.

As ODF and the Board of Forestry move forward, it is imperative to emphasize the significance of data-driven decision-making and transparent collaboration. It must be ensured that the interests of small businesses, communities, school children, law enforcement, and loggers are not only considered but honored.

The revised Implementation Plans, the Coho salmon settlement agreement, and the stewardship agreement have provided the gift of time. This extension in the decision-making timeline allows for a more measured and comprehensive approach. We ask that you seize this opportunity to conduct thorough impact assessments that take into account the concerns and aspirations of all stakeholders.

In the words of Theodore Roosevelt, 'The nation behaves well if it treats the natural resources as assets which it must turn over to the next generation increased, and not impaired in value.' Please ensure that the legacy we pass on to future generations is one of balanced harmony between environment and human prosperity.

Submitted: Wednesday January 3, 2024

Subject: Written comment on HCP

Message:

Hello Board Members,

I spoke today and am following up to provide more detail in writing.

My tribe, Shoalwater Bay, is losing its land due to flooding and erosion caused by climate change. We are forced to leave our traditional lands while the graves of our ancestors are washed away into the ocean as sea levels rise, which causes an intense sense of grief. We have to pay for our climate migration, which will cost half a billion dollars. Once we do move to higher grounds, the sea level may already reach our doors again.

The timber industry's production of wood is Oregon's largest carbon polluter. In 2021, we lost more than 100 Oregonians due to a heat wave that cooked them alive. We have already passed 2 degrees Celsius of warming compared to pre industrial times, and it is predicted we will reach almost 3 degrees by the end of the century. Climate change is exponential due to the feedback loops, like the ice caps melting which allows more heat to be absorbed by the ocean which causes more ice to melt. This will mean billions of deaths due to heat, flooding, drought, famine, and war. I am pursuing law so I can advocate for vulnerable, marginalized communities to sue those most responsible for the climate crisis, including the timber industry. When considering the "economic viability" of continued harvesting, the Board should consider climate liability, the billions of dollars the climate crisis will cause in damages, and the loss of timber production when the trees stop growing. We are already seeing shorter growing seasons due to climate change, and soon the trees will reach a threshold where they die off.

The Board should also consider the effects of the climate crisis on wildfires, which will affect the health of the people, animals, and trees. In undergrad, I studied biology and learned that particulate matter 2.5 and 10 from wildfires causes lung and heart disease and death, particularly among vulnerable populations. Old growth is most resilient to wildfires due to being higher up, having thick fire scars, and epigenetics (when the environment changes the genes of a living being). The timber industry also starts many wildfires. For example, the Tillamook Burn was started by people cutting down a Douglas Fir and dragging it on the ground. We also see many timber mill fires, like the recent one in the Gorge. Continuing this practice threatens our health and habitat. We are currently in the 6th mass extinction event. Species are under threat due to climate change, loss of habitat, and loss of the shade provided by trees. Therefore, the plan needs to consider the effects of climate change.

My main joy in life is hiking because of my emotional connection to nature. Through hiking the Oregon State forests I have seen the devastating clear cuts and timber trucks with trees almost as wide as I am tall. I have hiked up to Saddle Mountain, Kings Mountain, and Elks Mountain and have cried seeing the destroyed ecosystems. From satellite you can also see the damage of

decades of letting the timber industry sell out our futures. Our government owes us an obligation to protect our air, water, climate, and wildlife under the public trust doctrine. To fulfill this responsibility, the ODF must switch into emergency mode instead of continuing to be told "Don't Look Up" from the timber industry as we face extinction. The timber industry knew the harvests were unsustainable since the 1980s, like the oil and gas industry knew about climate change and covered it up with lies for profit. Like switching from coal meant coal miners losing their jobs, we have to think about the interest of the public as a whole and not just the interests of a few since this is public land. Otherwise, it is like them burning our house to keep them warm for a little bit.

Finally, I want to say that money isn't real, it is a social construct that will lose all meaning when civilization collapses. When our electric grid fails and there is no more food or water. It is like that scene in the Titanic when the rich man is trying to buy his way onto a life raft, but the man working on the ship says "Your money can't save you anymore than it can save me". Life is real, and we have the responsibility to protect life while we still can.

Best,

Jenna Ayers (she/her)

J.D. Candidate 2024, Lewis and Clark Law School

Submitted: Saturday, December 30, 2023 4:03 PM

Subject: Regarding: January 3rd Board of Forestry public meeting

Message:

Thank you for this opportunity to comment on the plan and your challenge to be concise. We've lived in Tillamook County for 22 years and own a 10 acre forest we bought for preservation. We're blessed with forest bathing and trail cam pics and scat of bear and coyote. I believe the years have passed for refining balances of economic, environmental, and human species rights and wants and simply listening to science, to our hearts, to indigenous voices and to keep an eye on the whole versus individual aspects of our forests. Sustainability is much bigger and ever more urgent. Board members themselves should be taking this stand and keeping this way of thinking at the forefront of discussion. I'm impressed by the GPV aspect of planning as a place to start. Carbon sequestration and watershed protections are immediate and can leverage other aspects of forest management.

Respectfully, Mike Cook

Submitted: Wednesday January 3, 2024

Subject: General

Message:

Don't allow the HCP "Forest Abandonment Plan" to be adopted as proposed. The Plan does not protect endangered species or fend off Environmentalists lawsuits. We need proper forest management. This needs to be accomplished without an economic impact to local communities dependent upon forest revenue.

Reference Jan. 3 meeting. Reviewing comments: 1. An opinion isn't correct because everyone has one. 2. The participants must work with all parties to develop options. 3 These options will include how every group will have responsibilities for a successful result. 4. In this case the options shouldn't be at the expense of the community. Respectfully, Tim Cowan

Respectfully Tim Cowan

The Citizen's Lobbyist tm

Forestry Board

1-3-24

My name is Duane Doyle.

- I own a fourth-generation family business employing approx. 1,000 people in Oregon. Some of our people live in rural communities that will be heavily impacted by this HCP. Such as Tillamook, Clatsop, and Washington counties.
- There are two key points I hope the Oregon Board of Forestry will consider prior to deciding on how to vote on this HCP.

1. **Social and Economic** – We are very concerned about the significant loss in funding. ODF averages \$118M in revenue from timber harvests, which will only decline with this HCP.

The loss of hundreds of jobs in counties like Tillamook, both direct and indirect will result in high unemployment. It's estimated that every 1MBF equals 11 local jobs. Even ODF will likely have to cut staff. We have seen this too many times throughout rural Oregon when Mills are closed, and the community never fully recovers!

2. **The HCP goes too far** - ODF's recent new modeling report shows harvest ranges for the proposed HCP will be a minimum of 50MBF less than the original target. They have also set aside tens of thousands of acres more to Habitat than their initial proposal to the Federal Government to gain approval.

For those that say timber dollars are an outdated way of funding local budgets, I'd offer a different perspective. The funding source isn't the problem. Wood is the most environmentally friendly building material and natural resource we have in Oregon and global demand will only continue to increase. The current model is sustainable and supports both working families and the services they depend on. So the question is, what's the alternative? Will the Board of Forestry leave it up to State Politicians that are out of touch with rural Oregon?

In closing, I am not against the HCP. What I am saying is that the current HCP as proposed, is not as balanced and fair as it could be between conservation and harvesting.

We ask the Board not to settle on an HCP that is highly compromised and does not meet the original stated objectives. Let's keep working to find a better solution for all the stakeholders involved.



December 28, 2023

Oregon Board of Forestry
Sent Via Email
boardofforestry@odf.oregon.gov

**RE: Comments on HCP/Forest Management Plan
Oregon State Forests**

Dear Chair Kelly and Members of the Board of Forestry:

The Great Old Broads for Wilderness is a national organization with a mission to protect public lands, forest and wilderness; we also advocate for our forests to be managed for climate mitigation. The Cascade-Volcanoes chapter has been involved in the Habitat Conservation Plan for Western Oregon State Forests (HCP), commenting on the draft HCP and the dEIS for the project, and we have also commented on the draft Forest Management Plan, (FMP) as a companion document to the Habitat Conservation Plan. We urge the Board of Forestry to submit the HCP to the federal agencies for final approval without delay. I will be giving oral testimony at the Board meeting on January 3rd.

Habitat Conservation Plan. Regarding the HCP, we view the HCP as a compromise, as 30% of mature forests are outside of the conservation areas, and small non-fish-bearing tributaries lack sufficient riparian buffers. We would prefer to see Alternative 3 be adopted, but if the alternative preferred by the Department of Forestry is selected, we urge expanded riparian buffers to protect listed aquatic species downstream of the tributaries.

The DOF has begun managing Habitat Conservation Areas according to the HCP. However, outside of the HCAs, the department must still survey for endangered species for each proposed timber sale. An advantage of an approved HCP, the federal agencies will issue Incidental Take Permits for the covered species. This will provide more certainty for timber production in stewardship stands.

Performance Measures for FMP. We have been told that the Performance Measures under development for the Forest Management Plan and the Adaptive Management Plan, will not be part of the final Forest Management Plan. We urge the Board to incorporate these management tools in the FMP by reference, thus keeping the FMP up to date and based on science. In order to comply with the OAR 629.935.0030, which requires the best available science to be utilized, there must be metrics with measurable outcomes to evaluate progress over time, by the Board and the public. When the Performance Measures were presented to the BOF in September, there was no baseline data yet incorporated in the measures.

We anticipate that the FMP will provide the framework for implementation of the Climate Change and Carbon Plan (CCCP), approved by the BOF on 11/3/2021. So far, we are disappointed in what has been included in the draft FMP and the Performance Measures. The draft FMP states that "Forests in the Coast Range and Western Cascades accumulate some of the highest densities of carbon on Earth through their productivity (p68)." We concur; Pacific Northwest forests with high productivity, and with low wildfire risk, are uniquely positioned to mitigate climate impacts. The Final FMP should provide data comparing the baseline carbon storage in Conservation areas and general stewardship (timber production) stands. Since the HCAs were established to include most older forest stands due to current and potential habitat for terrestrial covered species (e.g. Northern Spotted Owl and Marbled Murrelet), we can anticipate higher carbon storage per acre in the HCAs in the baseline data. Over time the difference should become more pronounced.

Adaptive Management Plan. The USFWS is developing a Barred Owl Management Plan, with comments on the draft Environmental Impact Statement due January 16th. The Broads urge the BOF and DOF to collaborate with the USFWS for management of the non-native barred owl within the habitat for the Northern Spotted Owl (NSO) in the permit area for HCP. As the stands within the conservation areas age to become better habitat for NSO, the Habitat Conservation Areas (HCAs) will be less suitable for barred owls and thus reduce the threat they pose to displacement of NSO. Recommendation from the Barred Owl Management Plan can be incorporated via the Adaptive Management Plan.

As we have stated in previous comments on the HCP and FMP, we urge that the Forest Management Plan co-manage conservation areas for endangered species habitat as well as for carbon storage and sequestration. This can meet the goals of the CCCP, and reduce impacts to production timber stands. Climate Change is one of the FMP Plan themes. We compel the BOF to develop the FMP to emphasize first, the role that forests can play in climate mitigation, and second, the impacts that climate change has on the forests.

Summary. The Great Old Broads for Wilderness appreciates the commitment of the Board of Forestry to manage our state forests for the greatest permanent value for all Oregonians. We urge the BOF and DOF to move forward with approval of the HCP without delay and finalization of the Forest Management Plan.

Sincerely,



Darlene Chirman
Leadership Team
Cascade-Volcanoes Chapter
Great Old Broads for Wilderness



[REDACTED]
[REDACTED] • Philomath OR, 97370
Phone: [REDACTED] • Fax: [REDACTED]

Oregon Board of Forestry,

Hello, my name is Trace Hahn. I'm a mechanical engineer who has worked in research and development for the past 11 years and represent B&G Logging. The HCP contains conjectured effects on species 70 years from now and needs to be re-considered.

The terrestrial conservation strategy estimates an increase in habitat to 134,000 acres for the northern spotted owl and 0% for the coastal marten. The habitat commitment for the Oregon slender salamander is 19,000 acres. A recent article in The Outlook noted that the salamander, once thought to only exist in old growth forests, was found thriving in abundance inside the city of Gresham, OR. This discovery left wildlife experts scratching their heads.

USGS recently published the results of three studies about the status of the threatened northern spotted owl populations. In one of the 3 studies led by a research wildlife biologist it was proven that removal of barred owls had a strong, positive effect on the survival of northern spotted owls, stopping their long-term population declines.

The single largest mortality of the marbled murrelet was about 8,400 in 1989 as a result of the Exxon Valdez oil spill, this immensely contributed to their decline. Scientists and wildlife biologists have stated that the largest threats to the murrelet population are oil spills and climate change.

Oregon wildfires burned 1.1 million acres in 2020 alone, killing an unimaginable number of species outlined in the HCP. Let's focus the HCP on wildfire prevention, pollution and climate change. Oregon cannot afford to have sub-standard scientists scratching their heads while coming up with an HCP that costs \$241M and is not certain to be effective for 70 years. More research needs to be done.

Sincerely,

Trace Hahn

B&G Logging & Construction, LLC.

Submitted: Monday, January 1, 2024 3:35 PM

Subject: Live testimony transcript for Jan 3rd public comment

Message:

Best of New Year's wishes to all of you... My name is Jay Haladay. Our family has a home in Arch Cape. You have seen me over the last few years testifying on behalf of our neighbors in Arch Cape. Our single source of drinking water is the watershed east of our respective properties, where we harvest water from wells and water rights granted by the state. The years of dialog about the Western Forest Management Plan and Habitat Conservation Plan have clouded whether this 75+ acres is protected from clear cutting. Protection is important to us because, like many other Oregonians, we don't have water supply alternatives. This point gets lost in the larger dialog about forest management, but our neighborhood wants you to block out the noise level and consider this as you make your final considerations about protecting forested lands from clear cut harvesting. When I was running my business and had big decisions, I always remembered that there was no perfect decision and that I would make mistakes. You are faced with the same in this situation with the decisions you face. The thing I always tried to remember was that since a perfect decision was never available, it was important to consider how quickly we could recover when a decision was shown to be wrong. Was it measured in days, weeks, months, years or decades? As you make your decisions, think about how quickly will water supplies heal after watersheds are clear cut? How quickly will habitats regenerate? Conversely, where do civic entities find new revenue streams, or adjust current spending habits? How do impacted businesses adjust to new realities? And employees readjust their skills and careers.? The timeframes involved to correct from poor decisions relative to the first two issues above might take years or decades to rebalance and recover. Nature has to take its course. And as we are finding with climate change issues, there will be unintended consequences. This could be a long and painful path. Relative to the later three, corrective action can be measured in months or years. Nature isn't involved...money and creativity are. The management of mitigating these repercussions is within our control. Change is hard. I changed jobs and moved my family as the result of the changes in my business environment. I sold a business because the market for its product was shrinking. People impacted by your decisions can adapt. It may take some funding changes from the state to plug some holes in local budgets, or for job retraining or relocation for individual unable to make a living where they currently reside. These things happen all the time for less consequential reasons. Let's think about the long term impacts of your decision. One of your responsibilities as a board is to provide leadership to your organization. Show leadership for the ODF team, separate out the noise created by the situation and make the right decision...and protect our water!

Respectfully submitted

Jay Haladay

Arch Cape, Oregon

Submitted: Tuesday, January 2, 2024 3:55 PM

Subject: HCP is too costly and needs rebalanced

Message:

State Forester Mukumoto and Board of Forestry.

My name is Jeremy Martin and I'm the Western Procurement Manager for NWH. NWH operates two sawmills in the State of Oregon (Eugene and Garibaldi) and one just across the Columbia in Washington (Longview) that **relies heavily** on the production of Red Alder from ODF ground. I'm writing to urge you to consider the actual cost the HCP will bring to rural Oregonians, a reduction of 34% will be felt by everyone. Our employees depend on the maximum sustainable harvest from ODF Timberland, a reduction in harvest will be devastating. In addition, adding thousands of acres more to habitat than was originally committed to the Federal Services is unacceptable and just doesn't make sense.

I've included two information letters for your review, so you can see the positive impact our company and its employees have on the communities.

Thanks

Jeremy Martin

Western Hardwood Procurement Manager





Simple. Natural. Hardwoods.



A SUSTAINABLE PARTNER IN OREGON

Born in the Pacific Northwest

Discover NWH, founded in 1967 in Arlington, WA, now a top hardwood lumber supplier serving North America, Europe, and Asia. Catering to furniture, flooring, cabinet, molding, and millwork industries, we offer 14+ domestic hardwood species, imported plywood, and exotic lumber. With 40+ cutting-edge facilities across the U.S., we're committed to simplifying our customers' experience while ensuring sustainability for future generations.



Eugene, OR

Eugene, OR

- Established 1996
- Oregon's 4th congressional district
- Avg # employees – 102
- Annual payroll - \$7.8mm
- Annual CapEx \$450k
- Indirect Impact on the Local Area:
 - Maintenance and Operating Supplies \$1.5mm (most purchased locally)
- Indirect Impact on the Local Area:
 - Trucking
 - 7,000 Log Trucks - By-products (chips, sawdust, hog fuel)
 - 590 trips annually (local carriers)

Garibaldi, OR

- Established 1996
- Oregon's 1st congressional district
- Avg # employees – 20
- Annual payroll - \$1.4mm
- Annual CapEx - \$150k
- Indirect Impact on the Local Area:
 - Maintenance and operating supplies - \$177k (most locally)
- Indirect Impact on the Local Area:
 - Trucking
 - 725 log trucks – By products (chips, sawdust, hog fuel)
 - 65 trips annually (local carriers)



Garibaldi, OR



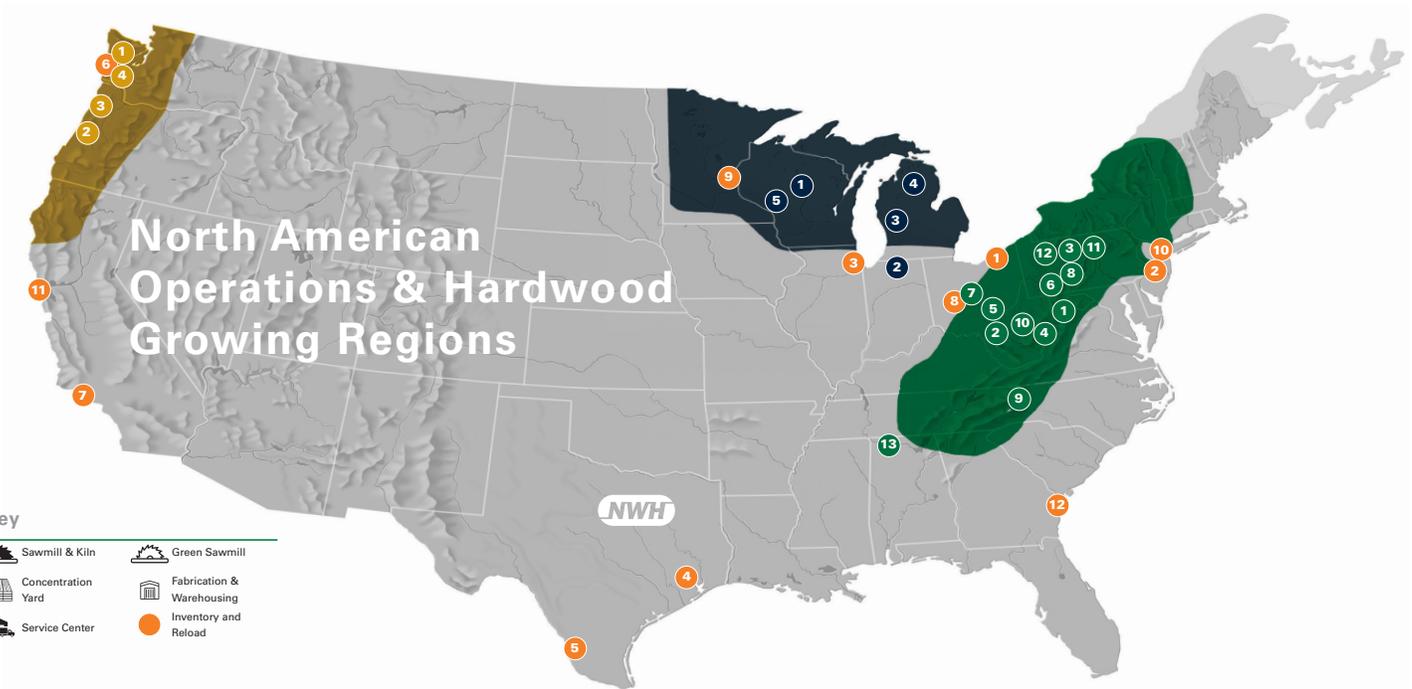
Simple. Natural. Hardwoods.

Environment & Sustainability

Sustainability is a key element to who we are as a company and an integral part of our overall strategy. Our customers require sustainable products, and their customers do, as well. To meet their needs and nurture a natural, emissions-reducing resource, we use the strictest sourcing and management practices and only work with partners that share our commitment to a sustainable supply chain.



We Are All In This Together



Key

Sawmill & Kiln	Green Sawmill
Concentration Yard	Fabrication & Warehousing
Service Center	Inventory and Reload

Inventory and Reload Locations

- | | |
|-----------------|-------------------|
| 1 Ashtabula, OH | 7 Los Angeles, CA |
| 2 Camden, NJ | 8 Loudonville, OH |
| 3 Chicago, IL | 9 Minneapolis, MN |
| 4 Houston, TX | 10 Newark, NJ |
| 5 Laredo, TX | 11 Oakland, CA |
| 6 Longview, WA | 12 Savannah, GA |

Manufacturing Locations

- | | |
|-----------------|--|
| 1 Centralia, WA | |
| 2 Eugene, OR | |
| 3 Garibaldi, OR | |
| 4 Longview, WA | |

Manufacturing Locations

- | | |
|--------------------|--|
| 1 Dorchester, WI | |
| 2 Elkhart, IN | |
| 3 Grand Rapids, MI | |
| 4 Lewiston, MI | |
| 5 Onalaska, WI | |

Manufacturing Locations

- | | |
|---------------------|--|
| 1 Buena Vista, VA | |
| 2 Dailey, WV | |
| 3 Endeavor, PA | |
| 4 Hacker Valley, WV | |
| 5 Hamden, OH | |
| 6 Hopwood, PA | |
| 7 Loudonville, OH | |
| 8 Marienville, PA | |
| 9 Marion, NC | |
| 10 Mill Creek, WV | |
| 11 Ridgway, PA | |
| 12 Titusville, PA | |
| 13 Tusculumbia, AL | |

Our Values





Simple. Natural. Hardwoods.



A SUSTAINABLE PARTNER IN WASHINGTON STATE

Born in the Pacific Northwest

Discover NWH, founded in 1967 in Arlington, WA, now a top hardwood lumber supplier serving North America, Europe, and Asia. Catering to furniture, flooring, cabinet, molding, and millwork industries, we offer 14+ domestic hardwood species, imported plywood, and exotic lumber. With 40+ cutting-edge facilities across the U.S., we're committed to simplifying our customers experience while ensuring sustainability for future generations.



Longview, WA

Longview, WA (Union Site)

- Established 1985 as NWH (purchased existing sawmill)
- Washington's 3rd congressional district
- Avg # of Employees: 165
- Annual Payroll: \$12mm
- Annual CapEx: \$1mm
- Indirect Impact to the Local Area:
 - Maintenance and Operating Supplies – \$1.7mm annually (most purchased locally)
- Indirect Impact to the Local Area: Trucking
 - 12,000 Log Truck deliveries annually (mostly local)
 - 1,100 By-Product (chips, sawdust, hog fuel) trips annually (local carriers)

Centralia, WA

- Established 1969 as NWH (purchased existing sawmill)
- Washington's 3rd congressional district
- Avg # of Employees: 140
- Annual Payroll: \$10.8mm
- Annual CapEx: \$700k
- Indirect Impact to the Local Area:
 - Maintenance and Operating Supplies \$1.6mm annually (most purchased locally)
- Indirect Impact to the Local Area: Trucking
 - 9,000 Log Truck deliveries annually (mostly local)
 - 980 By-Product (chips, sawdust, hog fuel) trips annually (local carriers)



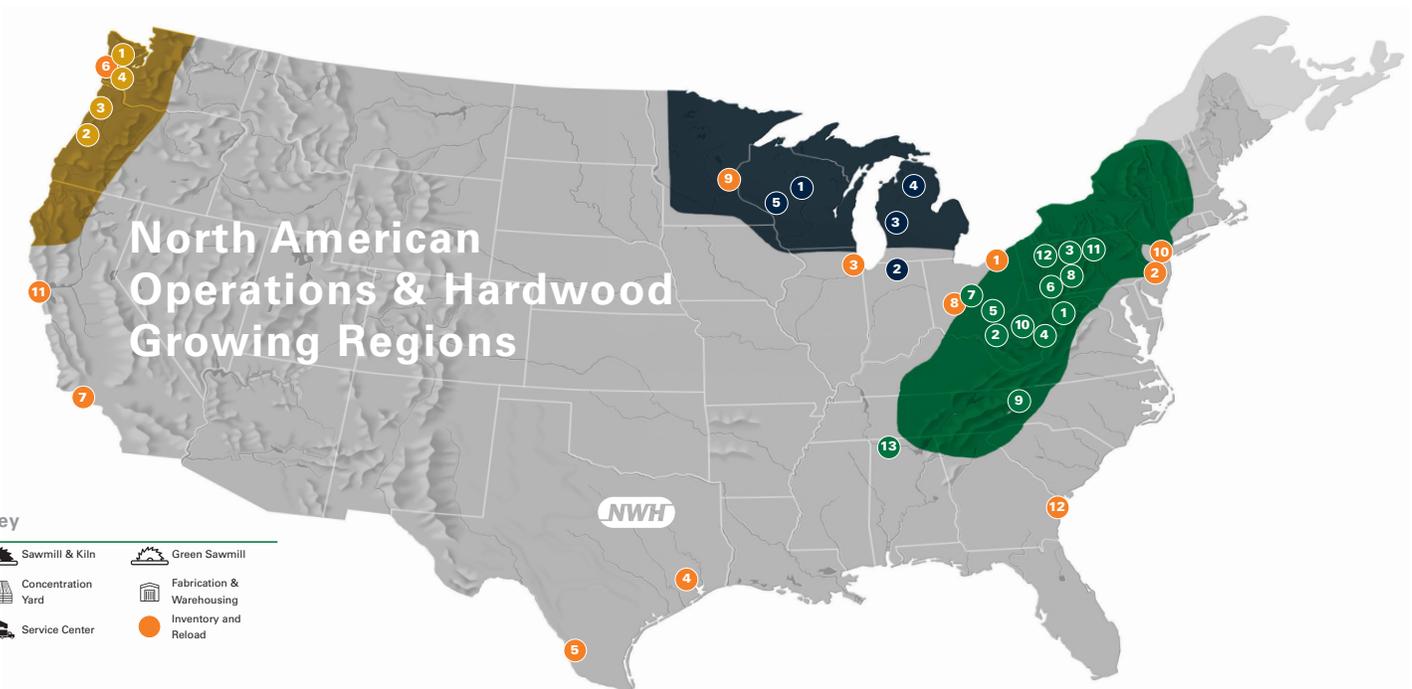
Simple. Natural. Hardwoods.

Environment & Sustainability

Sustainability is a key element to who we are as a company and an integral part of our overall strategy. Our customers require sustainable products, and their customers do, as well. To meet their needs and nurture a natural, emissions-reducing resource, we use the strictest sourcing and management practices and only work with partners that share our commitment to a sustainable supply chain.



We Are All In This Together



Key

Sawmill & Kiln	Green Sawmill
Concentration Yard	Fabrication & Warehousing
Service Center	Inventory and Reload

Inventory and Reload Locations

- | | |
|-----------------|-------------------|
| 1 Ashtabula, OH | 7 Los Angeles, CA |
| 2 Camden, NJ | 8 Loudonville, OH |
| 3 Chicago, IL | 9 Minneapolis, MN |
| 4 Houston, TX | 10 Newark, NJ |
| 5 Laredo, TX | 11 Oakland, CA |
| 6 Longview, WA | 12 Savannah, GA |

Manufacturing Locations

- | | |
|-----------------|--|
| 1 Centralia, WA | |
| 2 Eugene, OR | |
| 3 Garibaldi, OR | |
| 4 Longview, WA | |

Manufacturing Locations

- | | |
|--------------------|--|
| 1 Dorchester, WI | |
| 2 Elkhart, IN | |
| 3 Grand Rapids, MI | |
| 4 Lewiston, MI | |
| 5 Onalaska, WI | |

Manufacturing Locations

- | | |
|---------------------|--|
| 1 Buena Vista, VA | |
| 2 Dailey, WV | |
| 3 Endeavor, PA | |
| 4 Hacker Valley, WV | |
| 5 Hamden, OH | |
| 6 Hopwood, PA | |
| 7 Loudonville, OH | |
| 8 Marienville, PA | |
| 9 Marion, NC | |
| 10 Mill Creek, WV | |
| 11 Ridgway, PA | |
| 12 Titusville, PA | |
| 13 Tusculumbia, AL | |

Our Values



Submitted: Friday, December 29, 2023, 8:31 PM

Subject: comments for January board meeting (Habitat Conservation Plan)

Message:

Denise Monaghan
210 W. Grand Ave
Astoria OR 97103

I am writing as a concerned citizen about the state of our watersheds, rivers and streams, and the effects of clearcutting on wildlife and fish as well as people who call this land home. I moved to Oregon because of its immense natural beauty and fertile landscapes. The recreation the state offers to people who value an intact landscape is under threat from clearcutting practices, which continues to ignore science. Leaving older trees in the ground is one way to help sequester carbon and help with our worsening fires. Most of our old growth is gone, but timber industries are targeting 2nd growth forests who have managed to recover some of the biodiversity that was disregarded in the past. With the run off and areal spraying, streams have been degraded and our beleaguered salmon runs diminished. Marbled murrelets are having a hard time finding nesting sites, and the spotted owls are on their way out. The planting of timber valued mono crops isn't helping. We need a host of plants, fungal networks and wildlife to make a forest, because clearly, a forest is not a managed plantation.

I strongly urge the committee to adopt the Habitat Conservation Plan, which will begin to address some of these important issues. It would also preserve and protect some of our state's most treasured forestlands and rivers for generations to come. It's a compromise, but the logging industry believes these public lands are for them to cut with little accountability and is fighting this plan tooth and nail.

I live in Clatsop county and know this is a economic issue for a cash strapped county. I understand the district will lose some of the ODF revenue, but that will be made up in healthier water and land. It will help fish, campgrounds, recreational visitors, and protect the biodiversity of the state for years to come. Also consider that the Oregon Supreme Court has recently clarified what greatest permeant value (GPV) means and recognizes GPV is NOT determined by revenue generated from timber sales but is based on long term survivability and providing all Oregonians with wide benefits of healthy living ecosystems.

Thank you for listening.

Sincerely,

Denise Monaghan



OREGON CHAPTER SIERRA CLUB

1821 SE ANKENY ST • PORTLAND, OR 97214

PHONE (503) 238-0442 • FAX (503) 238-6281

OREGON.CHAPTER@SIERRACLUB.ORG

WWW.OREGON.SIERRACLUB.ORG

SIERRA
CLUB

FOUNDED 1892

December 29, 2024

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

Subject: Agenda Item #2 - Habitat Conservation Plan

Dear Chair Kelly and Members of the Board,

On behalf of the more than 70, 000 members and supporters of the Oregon Chapter Sierra Club, we thank you for your dedication in serving on the Board of Forestry and taking on the responsibility of protecting watersheds, soils, biodiversity, and the climate for all Oregonians and for future generations. After decades of overharvesting on state forests, a strong Habitat Conservation Plan is our best chance at restoring balance on state forest lands to stabilize harvests and habitat conservation for endangered and threatened species.

We urge you to adopt a strong HCP based on Alternative 3 without delay, and to oppose any effort to weaken and stall the HCP process for the following reasons. HCP Alternative 3:

- **Provides more adequate stream buffers.** The current HCP stream buffers are inadequate. Although even greater protections are needed, buffers provided in Alternative 3 are better for fish and wildlife species and their habitat, offering more of the necessary, long-term protections fish and wildlife require in the face of a changing climate.
- **Is supported by the best available science.** State law requires the Board to make decisions based on the best available science. A recent peer-reviewed study on the Trask River in Tillamook County proves that 35-foot buffers for clearcutting near small streams results in harm to downstream aquatic species. 50-foot buffers are strongly suggested to protect headwater streams. The study provides a strong scientific basis for stronger salmon habitat protections along tributary streams and around landslide-prone areas.
- **Meets the Greatest Permanent Value standard.** Public lands must be managed for the public good of all Oregonians, for current and future generations. In the Linn County court decision, the courts affirmed the state's mandate to manage state forests for the Greatest Permanent Value for

all Oregonians. We need an HCP that meets this standard. As climate change brings hotter and drier conditions to Oregon, clearcut timber harvest will continue to be the greatest factor limiting the survival of covered threatened and endangered species over which we have direct control. We ask the Board to resist calls for opening up the HCP, reducing habitat protections, and clearcutting thousands of additional acres.

- **Protects Oregon's public lands legacy.** In a [recent poll](#), Oregonians overwhelmingly support prioritizing fish and wildlife habitat, clean water, and recreation on state lands, especially supporting more protections for drinking water sources. More than 500,000 people in Northwest Oregon get their drinking water from streams and rivers that flow out of state forest land.

Habitat Conservation Areas

We urge you to stand strong against any effort to reduce Conservation Areas—both Habitat Conservation Areas (HCAs) and Riparian Conservation Areas (RCAs). Rather, in order to provide future old-growth habitat and much-needed carbon sequestration and storage, all adjacent mature stands should be included within the HCAs. Conservation Areas should be managed for both the protection and recovery of threatened and endangered species and as carbon reserves. The forests of western Oregon have the potential to be the world's greatest carbon storehouses. Managing these Conservation Areas as carbon reserves will contribute to meeting that potential and will help support implementation of the Climate Change and Forest Carbon Plan (CCCP) adopted by the Board of Forestry in 2021. Additionally, we urge the Board to add protections for the Cook Creek watershed, and prevent clearcutting in this important ecosystem.

The Oregon Chapter Sierra Club asks you to adopt a strong HCP based on Alternative 3 without delay, for the Greatest Permanent Value for Oregonians present and future. Thank you for considering our input on this important issue.

Carol Valentine

Carol Valentine
Forest Team Coordinator
Oregon Chapter Sierra Club

January 3, 2024

Oregon Board of Forestry
2600 State Street
Salem, Oregon 97310

Submitted via E-mail: boardofforestry@odf.oregon.gov

RE: Revised FMP Modeling Scenarios and Westside State Forest HCP

Dear Members of the Oregon Board of Forestry,

The Oregon Forest Industries Council writes to express our continuing concerns with the proposed westside state forest habitat conservation plan (the “HCP”) in light of the modeling information presented by the Oregon Department of Forestry (“ODF” or the “Department”) to the Board of Forestry (the “Board”) and the Forest Trust Land Advisory Council (“FTLAC”) in December, 2023, which quantified, for the first time, the scope of the impacts of the proposed HCP and the revised westside forest management plan (the “FMP” or the “Plan”) – of which the HCP is a part – on timber harvest volumes from state forests as well as acres of habitat created under the Plan in comparison to conservation targets.

As you all know, at the special meeting of the Board held on February 15, 2023 that was called to address the then-draft FY 24-25 Implementation Plans (“IPs”), the Board ultimately decided not to change course on the HCP until such time as it could see how the revised FMP would impact state timber harvest numbers, and whether the updated modeling would move the annual harvest volume closer to the originally projected annual harvest volume of 225 MMbf modeled by the Department in earlier stages of HCP development.¹ That work is now completed, and with the updated modeling, the Board has all the information that it sought. What OFIC and other stakeholders have said for months is now unequivocally clear: the conservation set-asides built into the draft HCP are simply too large to be overcome by harvest on acres outside of the habitat conservation areas (“HCAs”).²

The modeling scenarios also highlighted the imbalance in management caused by the proposed HCP by quantifying how much habitat would be created over and above what the Department committed to in negotiations with the federal services. The modeling scenarios demonstrate that the proposed Plan would result in exceedance of Northern Spotted Owl habitat targets by well-over 50%, or nearly 100,000 acres, within the first 14 years of the permit term.³ Dispersal habitat outside of HCAs likewise exceeded commitments by 50% *in the first year* of the Plan. Marbled Murrelet and Red Tree Vole⁴ habitat projections likewise far outpace commitments. In its presentation to the Board and the FTLAC, the Department passed these exceedances off as a necessary “buffer” to guard against unforeseen future events, such as stochastic disturbances, but it strains credulity that the potential for such disturbances were not considered when the target commitments were agreed to in the first place. In any case, we would submit that a 50% exceedance reads more like a mistake than it does a reasonable safety buffer.

¹ The modeling shown by the Department in late-2022 had initial harvest volumes remaining steady at or near the 10-year average of 250 MMbf and declining over the life of the plan to 200 MMbf.

² The highest harvest volume reflected among the various modeled scenarios was 187 MMbf, which was only marginally better than the high end of the harvest volume modeled under the FY 24-25 IPs, which ranged from 165 MMbf to 182 MMbf.

³ Biological goals and objects for NSO required total nesting, roosting, and foraging habitat of 134,000 acres by the *end of the 70-year permit term*. The modeling scenarios show that this number will be exceeded on day one of the plan and will increase to nearly 225,000 acres by year 14.

⁴ Which, we would note, has still not officially been up-listed.



Throughout the process of pursuing an HCP for state forests, the Board and the Department have stressed the need for operational certainty in the face of the increasing burden from avoiding take in the absence of the incidental take protection afforded by an approved HCP. We sympathize with the difficult position that the Department is in, and still believe that the Board is justified in pursuing an HCP. However, given these latest modeled numbers, we have become increasingly convinced that continued pursuit of the present draft HCP would do more harm than good and is simply not wise policy. We understand that even a revised HCP may still result in a reduction of harvest compared to the current 5- and 10-year average, but it behooves this Board and the Department to seek a plan that does a better job of balancing the competing values represented by our state's forest resources. A plan that so exceeds biological targets for habitat is a plan that has taken risk reduction beyond the point of parody.

Without further belaboring the point, in light of this most recent data, we implore this Board to task the Department with commencing work on a revised HCP that could come closer to achieving the original harvest targets of 225 MMbf, annually, and that does not exceed habitat commitments to the extent of the current proposal. We recognize that such action would necessarily extend the time horizon for obtaining a final HCP, potentially by multiple years, but in the context of a 70-year commitment, a year or two spent revising a plan in an effort to balance objectives and minimize social and economic impacts to communities and businesses that rely on the supply of fiber coming off of state lands seems like a worthwhile investment. It is not too late. This Board still has time to get this right and to arrive at a solution that works for all beneficiaries of state forests – one that works to the benefit of all Oregonians.

Sincerely,

A handwritten signature in black ink, appearing to read "Tyler Ernst".

Tyler Ernst
Policy Counsel, Manufacturing & Resources
Oregon Forest Industries Council



January 2, 2024

Oregon Board of Forestry
2600 State Street
Salem, Oregon 97310

RE: Support the State Forest Habitat Conservation Plan

Dear Chair Kelly and Members of the Board of Forestry:

The undersigned groups included in the State Forest Coalition, representing tens of thousands of Oregonians from across the state, thank you for the opportunity to provide comments on the Western Oregon State Forest Habitat Conservation Plan (HCP) and the Modeling Report.

After decades of overharvesting timber on state forests, the HCP is a necessary step to prevent the further decline of fish and wildlife listed under the Endangered Species Act (ESA). We recognize that this HCP is a compromise that may prevent the further decline of the 17 species covered under the HCP while allowing for future clearcutting and other habitat degradation on state forests. Our groups support an HCP, but continue to have concerns about the adequacy of the Habitat Conservation Areas (HCAs) and the Riparian Conservation Areas (RCAs) in preventing further decline of these species.

Recent modeling report, climate change and habitat estimates

Our groups recognize and appreciate the efforts by the Oregon Department of Forestry (ODF) staff to produce more accurate modeling of the effects of the HCP on timber harvest and habitat. The new timber harvest and habitat estimates show that the HCP will begin to restore some balance to state forest management by protecting an adequate amount of habitat for listed species while allowing more sustainable levels of timber harvest after decades of over-harvesting these forests. The Board and the state forester are not required to manage state forest lands to maximize revenue to the counties or exclude non-revenue producing uses. ([OAR 629-035-0010 \(4\)](#)), but the Board *is* required to base its management decisions on the best science available. ([OAR 629-035-0010 \(5\)\(e\)](#)).

However, there are some important concerns about the accuracy of the recent modeling. The modeling excludes the effects of climate change and assumes that future growth trends will be consistent with recent growth observations. The effects of climate change are likely to affect

future growth trends, which in turn affects the habitat estimates. The actual habitat resulting from the HCP may be considerably less than the habitat estimates produced by the model.

In contrast, in 2008 the U.S. Forest Service issued the [Strategic Framework for Responding to Climate Change](#), which stated, “Without fully integrating consideration of climate change impacts into planning and actions, the Forest Service can no longer fulfill its mission.”

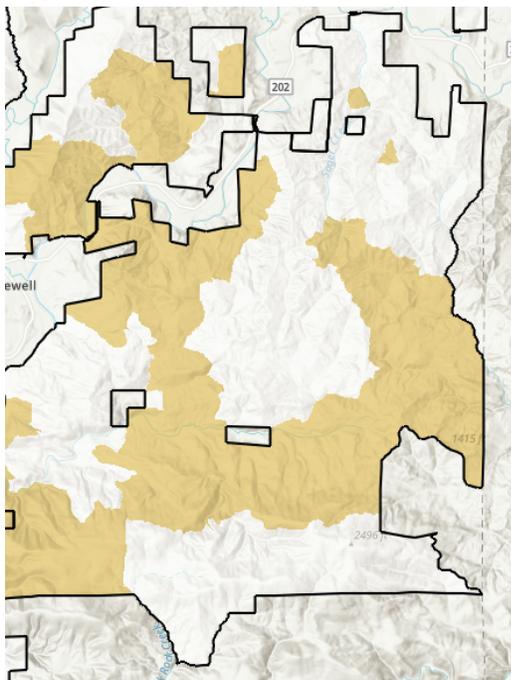
The Forest Service uses a climate extension to the Forest Vegetation Simulator as a tool for considering the effects of climate change on forest ecosystems. These and other similar tools are available to the ODF and should be applied in the future.

HCA boundaries and mature forests

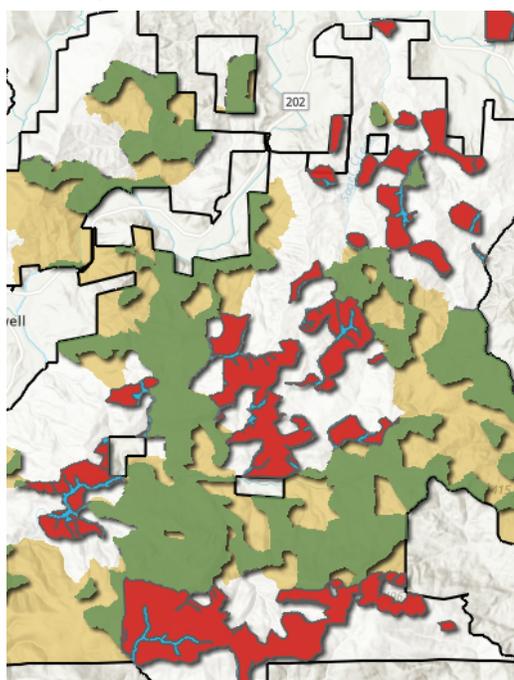
Our groups have analyzed the age classes of forest stands in western Oregon state forests and the amount of stands 80 years old and older that are included within the HCAs and RCAs. We determined that 30% of stands 80 years old and older are excluded from HCAs and RCAs. Many of these older stands are adjacent to HCA boundaries. In addition, ODF GIS layers with age class distribution and HCA boundaries, along with Google Earth images, indicate that recent clearcuts harvested within the past 5 years are included within the HCA boundaries. Including non-habitat within “Habitat” Conservation Areas and excluding current habitat adjacent to HCA boundaries is likely inconsistent with the best available science.

For example, below are snapshots of the Astoria District east of Jewell. In Map A, HCAs are depicted in tan. In Map B, mature forests within the HCAs are in green, and mature forests excluded from HCAs and RCAs are in red.

Map A.



Map B.



To improve the chances for survival of the upland species listed or soon to be listed under the ESA that inhabit state forests, all existing mature stands of forest should be retained.

RCA stream buffers are inconsistent with the best science available

Board of Forestry decisions, including this HCP and the Forest Management Plan, are required to be based on the best science available. A recently peer reviewed study published in [Forest Ecology and Management](#) concluded that clearcut logging has a negative impact on amphibians inhabiting adjacent headwater streams. The study of tributaries of the Trask River in the Tillamook State Forest also found negative effects on amphibians downstream of the clearcut area and increasing the buffer size to 12 meters (39.3 feet) did not diminish these impacts.

The proposed HCP would only require 35-foot buffers between clearcuts and small streams. According to the best science available, these buffers would result in adverse effects to adjacent and downstream amphibians. The Board's rules require increasing these buffers beyond 39.3 feet to be consistent with the best science available. Our groups recommend implementing a minimum of 50-foot buffers on small streams.

Protect Cook Creek from clearcut logging and road building.

Cook Creek is a steeply sloped 18,000-acre watershed that flows into the lower Nehalem River. Cook Creek is designated as an aquatic anchor by the ODF and provides critical habitat for Oregon Coast coho salmon, listed as threatened under the federal ESA, as well as Oregon Coast Chinook salmon. The Cook Creek watershed also provides cold water refuge to migrating fish in the Nehalem River. The ODF has proposed rebuilding a section of road that was washed out in 2015, building several miles of new roads on steep slopes and approved clearcutting 233 acres within this aquatic anchor watershed in the 2024 Annual Operating Plan. Our groups oppose road building and clearcut timber harvest in this watershed and ask the ODF to abandon plans for road building and clearcut logging in this important aquatic anchor.

In conclusion, we thank you for your continued dedication toward finalizing the HCP, protecting important habitat for imperiled species, and restoring balanced management to Oregon's state forests.

Sincerely,

Steve Griffiths
Conservation Action Chair
Audubon Society of Lincoln City

Chuck Willer
Executive Director
The Coast Range Association

Casey Kulla
State Forest Policy Coordinator
Oregon Wild

Rand Schenck
Forestry and Natural Lands Lead
MCAT, Mobilizing Climate Action Together

Victoria Frankeny
Riverkeeper & Staff Attorney
Tualatin Riverkeepers

Grace Brahler
Wildlands Director
Cascadia Wildlands

Brenna Bell
Forest Climate Manager
350PDX

Joe Liebezeit
Assistant Director of Statewide Conservation
Portland Audubon

Darlene Chirman
Great Old Broads for Wilderness
Cascade-Volcanoes Chapter

Scott Penzarella
Executive Director
Sisters Trails Alliance

Julia DeGraw
Coalition Director
Oregon League of Conservation Voters

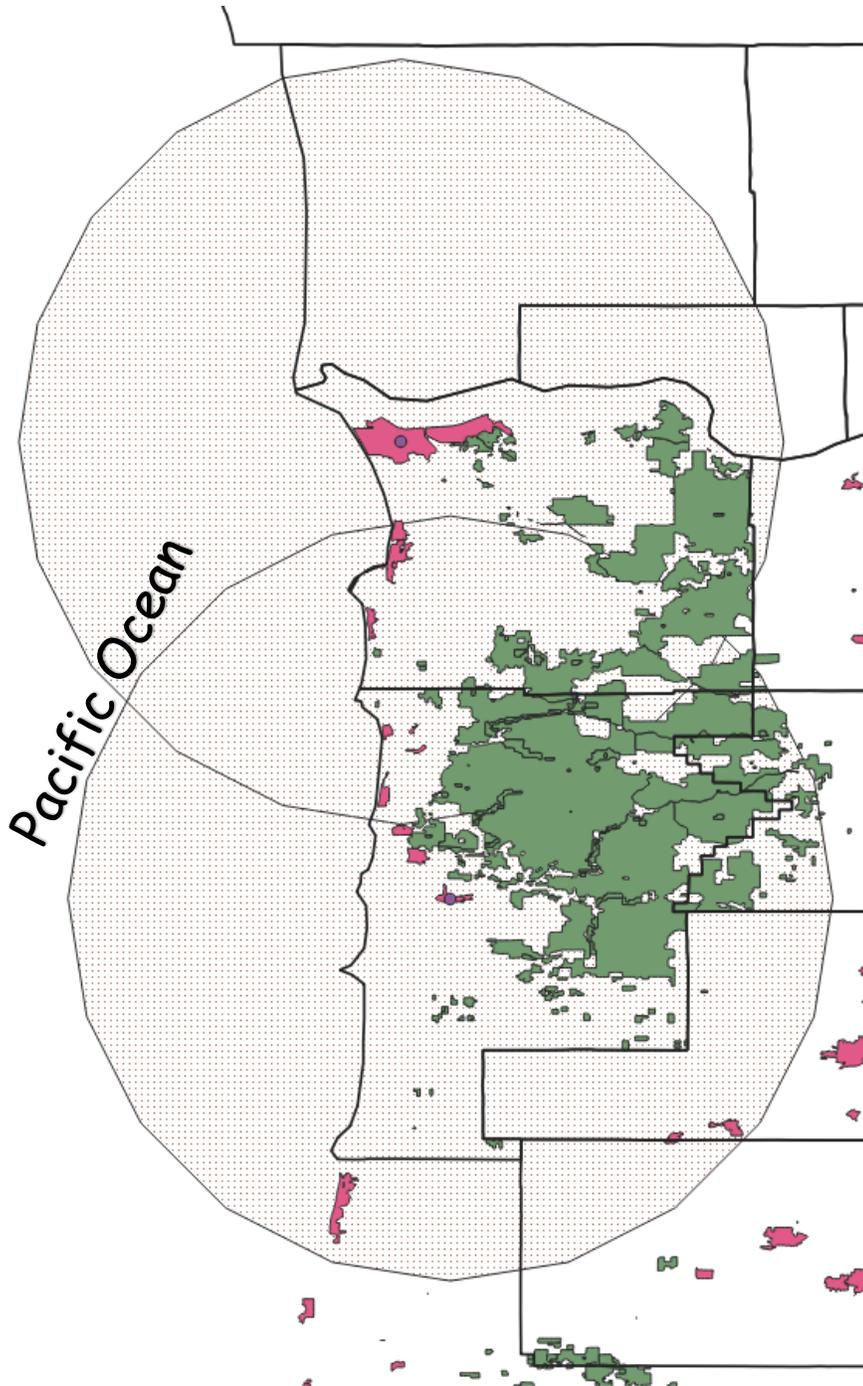
Michael Lang
Senior Policy Manager
Wild Salmon Center

Damon Motz-Storey
Chapter Director
Sierra Club, Oregon Chapter

Oregon Dept. of Forestry – Board of Forestry
2600 State Street
Salem, OR 97310

December 26, 2023

Re: January 3 and 4, 2024 meeting, Public Comment State Forests Habitat Conservation Plan



Dear Board of Forestry:

I am concerned about how the planned Habitat Conservation Plan as currently proposed by the State Forests Division will affect the possibility of timber harvests in Northwest Oregon.

The continued viability of sawmills located Northwest Oregon is critical for Small Forestland Owners wishing to manage their forestland. Without the opportunity to market their logs silvicultural activities to create climate change resilience and defensible space around structures can become uneconomical.

Shown to the left are 40-mile circles around Tillamook and Warrenton. Within the circle lies much of the Tillamook and Clatsop State Forests and a significant portion of the Pacific Ocean. I drew that to show how important the State Forests are to providing raw material for sawmill operations.

Please revise the HCP to allow additional timber harvests. What happens on State Forests has a much broader impact than the property boundary.

Sincerely,

David Wells
Tillamook OR 97141



STAND TALL | OREGON

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

We, the undersigned, are writing to applaud efforts by the Board of Forestry and your staff 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.

The HCP must be based on the best available science, and that requires including larger stream buffers on small tributary streams. With the recent peer reviewed study on the Trask River, we now know that 50-foot buffers on small streams are necessary to protect downstream aquatic species listed under the Endangered Species Act from the impacts of clearcutting. HCP Alternative 3 would require these 50-foot protective buffers and is more consistent with the best available science. Further, inclusion of wider stream buffers in the HCP should cause no additional delay.

Oregon's state forests have been overharvested for the past 20 years, and the revised timber harvest estimates are necessary to prevent harm to threatened species, comply with the Endangered Species Act, and manage our state forests for the "greatest permanent value" as required by state law.

Now that the revised harvest estimates are available, please direct staff to move forward with federal agencies to finalize the HCP as soon as possible.

Signed,

Bridget Welch	Portland	OR
Drew Clendening	Portland	OR
Mary Welch	Bend	OR
Kathleen Lisac	Portland	OR
Joanna Roberts	Portland	OR
Clark Miller	Wheeler	OR
Susan Tone	Nehalem	OR
Lori O'Neil	Gearhart	OR
Kip Sallak	Beaverton	OR
Kevin Ritscher	Portland	OR
Micah Barron	Astoria	OR
Christopher Bond	Beaverton	OR
Teri O'Donnell	Rockaway Beach	OR
Claire Shearer	Portland	OR
Kate Merrell	Arch Cape	OR

STAND TALL | OREGON



Anna Cowen	Oregon City	OR
Jody Creasman	Portland	OR
Mary Sutherland	West Linn	OR
Monica Gilman	Estacada	OR
Jay Humphrey	Estacada	OR
Charlene Houtz	Salem	OR
Kathy Moore	Salem	OR
Richard Pentz	Portland	OR
Virginia Jordan	Albany	OR
Janet Frisella	Williams	OR
Rachael Rude	Beaverton	OR
Henry Whorrall	Portland	OR
Colin Mosgrove	Salem	OR
Linda Biesiadecki	Portland	OR
Lisa Read	Happy Valley	OR
Anna Salgado	Dallas	OR
Sidney Wood	Seaside	OR
Heather Watts	Portland	OR
Shannon Kiehn	Woodburn	OR
Ciel Lorenzen	Portland	OR
Becky Graham	Seaside	OR
James Jacobson	Eugene	OR
Charlotte Stuart	Portland	OR
Amy Lesan	Corvallis	OR
Dot Rowland	Scappoose	OR
Max Robson	Lake Oswego	OR
Cynthia McCoy	Bay City	OR
Laura Hunter	Eugene	OR
Deisiane Bresolin	Portland	OR
Amy Camarena	Portland	OR
Zachary curry	Rogue River	OR
Yancette Halverson	Portland	OR
Pauline Cooper	O Brien	OR
Grace Goode	Eugene	OR
Carl Shoemaker	Bend	OR
Beck Caballes	Beaverton	OR
Suzi Kelley	Forest Grove	OR

STAND TALL | OREGON



Maria Gallegos	Portland	OR
Christopher Armstrong-Stevenson	Seaside	OR
MandyJean Eattock	Oregon City	OR
Kraig Belz	Gladstone	OR
Judy Herrington	Portland	OR
Mary Sykes	Beaverton	OR
Gloria Thomson	Portland	OR
Laura Ladd	Salem	OR
Bert de Klerk	Vida	OR
Megan Perry	Idleyld Park	OR
S.Rae Davies	Portland	OR
Bettina Nichols	Astoria	OR
Lisa Pilkenton	Hillsboro	OR
Lori Hood	Corbett	OR
matthew leno	Grand Ronde	OR
Alexandria Monroy	Saint Helens	OR
Heather Fulton	Portland	OR
Megan Allen	Portland	OR
Kayna Warren	Gold Beach	OR
Monica Craven	Portland	OR
Beth Hinson	Dundee	OR
Hannah Gleason	Portland	OR
Clara Putnam	Eugene	OR
Kent St. John	Portland	OR
Linda Seiler	Portland	OR
Bridget Bayer	Portland	OR
Lewis Barr	Lake Oswego	OR
E Sherry	Salem	OR
Stacy Alaimo	Eugene	OR
Maren Sinclair	Portland	OR
Kimberley Alexander	Portland	OR
Ron Bloodworth	Portland	OR
Robert Duval	Portland	OR
michael schulte	Portland	OR
Oakley Brooks	Portland	OR
Dana Bleckinger	Yachats	OR
Liz Byrd	Yachats	OR

STAND TALL | OREGON



Nathan Moomaw	Oregon City	OR
Phillip Callaway	Crawfordsville	OR
Philip Ratcliff	Salem	OR
Craig MACKIE	Camp Sherman	OR
Sara Pritt	Eugene	OR
Ronald Spies	Depoe Bay	OR
Janie Thomas	Eugene	OR
Martha Neuringer	Forest Grove	OR
Richard Felley	Nehalem	OR
Kim Koch	Nehalem	OR
Kathleen Rutecki	Eugene	OR
Barbara Linnett	Astoria	OR
Nancy Holmes	Seaside	OR
Fay Harrison	Hillsboro	OR
Anna Pospeshnaya	Portland	OR
James Kehoe	Portland	OR
Cathryn Davenport	Newberg	OR
Richard Harrington	Oregon City	OR
Molly Kohnstamm	Portland	OR
Julie Buchenau	Cloverdale	OR
Katheryne Mckenzie	Otis	OR
Stephen Fuller-Rowell	Eugene	OR
Gail Sabbadini	Otis	OR
Kenlynn Hamilton	Portland	OR
Jim Stuller	Salem	OR
Mary OSULLIVAN	Forest Grove	OR
Rose Lee	Portland	OR
William O'Brien	Beaverton	OR
Micky Clark	Nehalem	OR
Jef Gunn	Portland	OR
Ann Albrich	Beaverton	OR
Joyce Hyne	Portland	OR
Matthew Maynard	Portland	OR
Jane Morrison	Portland	OR
Robert Izatt	Portland	OR
Michael Berman	Gladstone	OR
Debra Levinson	Eugene	OR

STAND TALL | OREGON



Grant Wenger	Portland	OR
Arianna Johnson	Redmond	OR
Deborah Roth	Corbett	OR
Alison Kalnins-McGrath	Waldport	OR
Allyson Flagg-Miller	Salem	OR
Fred Crowe	Oregon City	OR
Jay Somers	Newberg	OR
Christopher Farrar	Astoria	OR
Ian Rowan	Molalla	OR
Julie Thanem	Beaverton	OR
Patricia Tschesche	Salem	OR
Isobel Musich	Portland	OR
Lila Gomez	Happy Valley	OR
Nicholas Rowell	Pacific City	OR
Diana Wiener	Saint Helens	OR
Tera Tolar	Irrigon	OR
Artemio Paz	Springfield	OR
Sandra Johnson	Rockaway Beach	OR
Paul Naylor	Eugene	OR
Cornelia Gibson	Wilsonville	OR
Paul Adamus	Corvallis	OR
Megan Rudt	Beaverton	OR
Juniper Taylor	Portland	OR
Stanton N. Parmeter Parmeter	Salem	OR
Michelle Winner	Sandy	OR
Christoph Zurcher	Beaverton	OR
David Simon	Corvallis	OR
Chaplain. Kraig Belz	Gladstone	OR
Aaron Versteeg	Silverton	OR
Rony Galdámez	Gresham	OR
Stashu Smaka	Tillamook	OR
Brock Germinara	Beaverton	OR
Noah Camuso	Albany	OR
Christina Burress	Tillamook	OR
Jeffery Aldrich	Sheridan	OR
John Klock	Albany	OR
Kelly Lanspa	Portland	OR

STAND TALL | OREGON



wendy blackburn	Seaside	OR
Kay Alcorn	Corvallis	OR
Kathleen Chauran	Mulino	OR
Woody CV Woodard jr	Salem	OR
Paul Shively	La Grande	OR
Bob Hannigan	Corvallis	OR
Mike Brinkley	Eugene	OR
Adam Lee	Portland	OR
Cierra Buer	Powell Butte	OR
Randall Koch	Neskowin	OR
Greg Kimball	Forest Grove	OR
Bruce Burnett	Central Point	OR
Teresa DeLorenzo	Astoria	OR
Marilee Corey	Salem	OR
Joyce Sherman	Portland	OR
Susan Haywood	Portland	OR
AMEE PACHECO	Portland	OR
Darren Coleman	Roseburg	OR
Andrea Pellicani	Coos Bay	OR
Maureen O'Brien	Portland	OR
Marjorie Nafziger	Portland	OR
Nancy Carl	Carlton	OR
Nora Polk	Portland	OR
Randy Harrison	Eugene	OR
Debra Rehn	Portland	OR
Maureen O'Neal	Tigard	OR
Ian Shelley	Portland	OR
Helen Anderson	Gladstone	OR
Peter Sergienko	Portland	OR
Judith Lienhard	Portland	OR
Helen Moissant	Central Point	OR
Sharon Hunt	Beaverton	OR
Diana Boom	Lake Oswego	OR
Jamie Shields	North Plains	OR
Jan Bird	Lostine	OR
Priscilla Lane	Portland	OR
Donlon McGovern	Portland	OR

STAND TALL | OREGON



Robert Jones	Roseburg	OR
Michael Mclean	Portland	OR
Dan Sherwood	Portland	OR
mark day	Portland	OR
Erika Kane	Hubbard	OR
Glen Comuntzis	Tigard	OR
Harry Freiberg	Brookings	OR
Lida Stevenson	Corvallis	OR
Loreli Fister	Corvallis	OR
Mark Wheeler	Portland	OR
Mauria McClay	Portland	OR
Mira Wiegmann	Portland	OR
Nancy Marshall	Portland	OR
Richard Payne	Beaverton	OR
Nancy Fleming	Lake Oswego	OR
Rebecca Baker	South Beach	OR
Jeffrey White	Forest Grove	OR
Susan Wechsler	Corvallis	OR
Bc Shelby	Portland	OR
Charlie Graham	Hillsboro	OR
Nina French	Portland	OR
Meaghan Doherty	Bend	OR
Paul Daniello	Pendleton	OR
Janet H.	North Bend	OR
A. Todd	Eugene	OR
Michael Halloran	Salem	OR
Sky Yeager	Philomath	OR
Jerry Charlson	Oregon City	OR
Mary Englert	Portland	OR
Sandra Siegner	Portland	OR
Heather Curilovic	Portland	OR
Scott Maclowry	Bend	OR
Rebecca HAAS	Portland	OR
William Proebsting	Corvallis	OR
Frank Rouse	Colton	OR
Barrett Edgar	Gold Beach	OR
Rebecca French	Sisters	OR

STAND TALL | OREGON



Carol Milliman	Eugene	OR
Tram Ngo	Portland	OR
Diane Daiute	Sweet Home	OR
Janice VrMeer	Ashland	OR
Josh Woolley	Hillsboro	OR
nina mcnitzky	Estacada	OR
Emily Lisborg	Oregon City	OR
Sandy Wilson	Wilsonville	OR
Jim Pruett	Ashland	OR
Victor Grandidier	Bend	OR
Lisa Rosenfield Podolsky	Waltersville	OR
Margaret Heydon	Portland	OR
Kristin Smith	Portland	OR
Marcia Rodine	Ashland	OR
Steve Trask	Alsea	OR
William Rizer	Carlton	OR
jennifer jensen	Eugene	OR
Charles Lief	Milwaukie	OR
Dawn Griffin	Portland	OR
Lora Meisner	Salem	OR
James Rankin	Corvallis	OR
Anita Gimre	Banks	OR
Juliana Cyman	Hillsboro	OR
Kate Lundquist	Medford	OR
ROBERT PLATA	Salem	OR
Kyle Collins	Bend	OR
Steve Radcliffe	Grants Pass	OR
John MacDonald	Portland	OR
Celia Davis	Astoria	OR
Tammy Bittler	Newport	OR
Jim Gear	Medford	OR
Carol Fairbanks	Albany	OR
Ali Risdon	Bend	OR
Kate Daly	Salem	OR
Dave Willis	Ashland	OR
Sandra Joos	Portland	OR
Beth Levin	Portland	OR

STAND TALL | OREGON



jordan gulaskey	Nehalem	OR
Peggy Kennedy	West Linn	OR
Karen Grandidier	Bend	OR
Mitch Stargrove	Hillsboro	OR
Ed Crist	Corvallis	OR
Ted Chu	Nehalem	OR
Chuck Gehling	Hood River	OR
Marilyn Clark	Culver	OR
Irene weiss	Corvallis	OR
George Hague	Astoria	OR
Gwynn Llewelyn	Portland	OR
Laura Iler	Portland	OR
Carrie Tilton-Jones	Portland	OR
Tanya Gilula	Portland	OR
Kristy Giles	Clackamas	OR
Jared Mitchell	Tigard	OR
Heather Ikeler	Portland	OR
Fran Recht	Depoe Bay	OR
Jeff Obermeier	Portland	OR
gm whiting	Joseph	OR
Marie Wakefield	Newport	OR
Thomas Austin	Portland	OR
Mary Ann Rudy	Portland	OR
Diana Pace	Roseburg	OR
Judy Kinsman	Florence	OR
Jolin Halstead	Hillsboro	OR
Maile Anthopoulos	Beaverton	OR
Cameron Jack	Warm Springs	OR
Ervine Nelson	Beaverton	OR
Emily Akdedian	Manzanita	OR
Penny Signalness	Corvallis	OR
John Livingston	Salem	OR
Marji Peterson	Medford	OR
R. Duncan Kerst	Portland	OR
Nathan Nebergall	Forest Grove	OR
Ann Hollyfield	Waldport	OR
R Weiss	Port Orford	OR

STAND TALL | OREGON



Daniel Jaffee	Portland	OR
Richard Wros	West Linn	OR
Roger Dorbasd	Astoria	OR
Sandra Thompson	Bend	OR
Stephen Oder	Corvallis	OR
Thomas Ray	Portland	OR
tosh myers	Deer Island	OR
Jack and Pam Shorr	Beaverton	OR
Cristin OBrien	Portland	OR
Mark Schwebke	Sandy	OR
Norm Ploss	Bend	OR
Bryan Mullaney	Beaverton	OR
Miriam Landman	Corvallis	OR
Pennie Granstrom	Hillsboro	OR
Craig Zarling	Portland	OR
Michael Maas	Wilderville	OR
Amy Knittel	Milwaukie	OR
Kathy Stevenson	West Linn	OR
Stephanie Cowles	Dayton	OR
Michael Wille	Portland	OR
Holly Manno	Lake Oswego	OR
Linda Marshall	Culver	OR
Patricia Durkin	Cannon Beach	OR
Sheryl Wheeler	Portland	OR
Phillip Roberts	Portland	OR
Kimberley Reed Zauber	Aumsville	OR
Judy Alleruzzo	Sherwood	OR
Sandra Stoffel	Oakridge	OR
Audie Paulus	Portland	OR
Ellie Stair	Portland	OR
M. Susan Dean	Portland	OR
Ellen Saunders	Manning	OR
Gary Millhollen	Eugene	OR
Ann Carter	Portland	OR
Gary Bell	Oregon City	OR
Catherine Keys	Ashland	OR
Randall Nerwick	Milwaukie	OR

STAND TALL | OREGON



Diane Luck	Portland	OR
Melissa Hathaway	Portland	OR
s cook	Portland	OR
Jerry Jump	Eugene	OR
Lary McKee	Gervais	OR
Casey Cunningham	Portland	OR
Victor Novick	Ashland	OR
Mary Buckley	Portland	OR
Ramona DeNies	Portland	OR
Elisabeth Gross	Bend	OR
Annita Bowman	Ontario	OR
Andrea Carlstrom	Portland	OR
John Selove	Eugene	OR
Debra Smith	Milwaukie	OR
nathan wetzel	Portland	OR
Linore Blackstone	Portland	OR
Mary Lou Emerson	Portland	OR
Marie Bayus	Grants Pass	OR
Jody Cunningham	Cottage Grove	OR
Shalynn Pack	Junction City	OR
Jim Fety	Rogue River	OR
Mark Rogers	Sandy	OR
Paula Beers	Beaverton	OR
Gail OHara	Portland	OR
Greg Darling	Corvallis	OR
ERIC NIELSEN	Portland	OR
Pam Birmingham	Seaside	OR
Pamela Howard	Portland	OR
Jason Dutra	Corvallis	OR
John Altshuler	Eugene	OR
Kristie Bell	Oregon City	OR
Emily Platt	Portland	OR
Caroline Ebner	Corvallis	OR
Jacob Apenes	Portland	OR
Brian Oliver	Joseph	OR
Michael Chamberlain-Torres	Portland	OR
Darwin Ray	Medford	OR

STAND TALL | OREGON



Pete Gonzalves	Eagle Point	OR
Mary McGaughey	Gresham	OR
Kim Wick	Buxton	OR
Katherine Bell	Oregon City	OR
Elias Harold	Astoria	OR
Walt Mintkeski	Portland	OR
Nicholas Wagner	Portland	OR
Miriam Reed	Ashland	OR
Jan Hart Weihmann	West Linn	OR
Claudia Beausoleil	Williams	OR
Donald A. Warner	Portland	OR
Skye Decker	Hillsboro	OR
Emeline Cuisset	Philomath	OR
Irene Rowe	Vancouver	WA
Suz Koch	Battle Ground	WA
Katherine Hogue	Camas	WA
Jeanne Crowley	Seattle	WA
Luan Pinson	Vancouver	WA
Newcomb Lydia	Vancouver	WA
Marlene Hache	Raymond	WA
Jeff Martin	Seattle	WA
Harry Gerecke	Vashon	WA
heidi shuler	Vancouver	WA
Ellen Prior	Covington	WA
Meryle A. Korn	Bellingham	WA
Maureen Belle	Langley	WA
Arlene Spencer	Bainbridge Island	WA
Gabriel Newton	Burien	WA
Virgene Link-New	Anacortes	WA
Achala Devi	Woodinville	WA
Henry Phillips	Hoodspport	WA
August Ashmun	Seattle	WA
Dan Rogers	Washougal	WA
Gloria McClintock	Mount Vernon	WA
Ben Rall	Spokane	WA
j heasley	Bellingham	WA
Sara E Eldridge	Seattle	WA

STAND TALL | OREGON



Janice Janice	Port Angeles	WA
Jo Ellen Woodrow	Vancouver	WA
Yvonne Mancini	Vancouver	WA
Jane Nicolai	Vancouver	WA
Joyce Grajczyk	Kent	WA
Ian Brown	Seattle	WA
Susan Finkel	Seattle	WA
Don Morrison	Spokane	WA
Larry Franks	Issaquah	WA
Ahnna Weber	Stoughton	WI
Anja Phenix	Healy	AK
Alix Bowman	Anchorage	AK
Zuzanna Wilk	Katowice	AL
Allen Owensby	Tucson	AZ
Diana Wilkinson	Flagstaff	AZ
Annie D McMahon	Clarkdale	AZ
Karen Oneill	Scottsdale	AZ
Thomas Casey	Grand Canyon	AZ
test test	Los Angeles	CA
Eli Turner	Roseville	CA
	Huntington	
Chuck Nelson	Beach	CA
Jill Davine	Culver City	CA
Caryn Graves	Berkeley	CA
Michael Price	San Francisco	CA
Carol Schaffer	San Pablo	CA
Dalia Salgado	Los Angeles	CA
Paul Hunrichs	Santee	CA
Jacqueline Carroll	Paso Robles	CA
Virginia Turner	Woodland Hills	CA
YVONNE CHAVEZ	Carlsbad	CA
Jordan Briskin	Palo Alto	CA
Bridgett Heinly	San Diego	CA
Kathleen McKeough	Santa Cruz	CA
holly gilzow	Oceanside	CA
Colleen Lobel	San Diego	CA
Everett A. Vieira III	Turlock	CA

STAND TALL | OREGON



Marti Jurick Jurick	Moorpark	CA
K. Rice	Willits	CA
Adam Resnick	Los Angeles	CA
Charles Hammerstad	San Jose	CA
Rick Luttmann	Rohnert Park	CA
Silvia Rocha	Azusa	CA
Holly Hall	Temecula	CA
Jasha Stanberry	Santa Barbara	CA
Michael W Evans	Los Angeles	CA
James Yarbrough	Newbury Park	CA
Jo Tolla	Woodland	CA
Bernadette Garza-Abbey	Highlands Ranch	CO
Pam Sheeler	Loveland	CO
Katy Gruenbaum	Ramah	CO
Joan Donnaway	Hesperus	CO
Leila Mohseni	Boulder	CO
Roy Ferguson	Aurora	CO
Torunn Sivesind	Lakewood	CO
Dianne Alpern	Boulder	CO
Erika Agnew	Denver	CO
Karen Schnitzer	Cheshire	CT
Jill Alibrandi	Redding	CT
Louise Simone	Washington	DC
Mary ODonnell	New Castle	DE
Paula Morgan	Winter Springs	FL
Debora Hojda	Miami	FL
Michael LeHew	Port Saint Lucie	FL
Mike Gilligan	St Augustine	FL
Linda Vopicka	Tampa	FL
Mary Martin	Atlanta	GA
Lorraine Akiba	Honolulu	HI
Tim Quirante	Honolulu	HI
John Hanousek	Boise	ID
Jerald Vegwert	Hailey	ID
Andrew Hellinger	Chicago	IL
jane doe	Yorkville	IL
dane doe	Yorkville	IL

STAND TALL | OREGON



sherry doe	Yorkville	IL
Nicholas Bridgett	Champaign	IL
Sandra Couch	Naperville	IL
Greg Stawinoga	South Holland	IL
mattia foschi	Bath	IN
Dr.Tammy King	Gardner	MA
Dennis Rogers	Hubbardston	MA
Brenda Agnew	Haverhill	MA
Jodi Rodar	Pelham	MA
Tammy King	Gardner	MA
Wendy Fossa	Essex	MA
Daniela Relf	Glen Burnie	MD
Ronnie Townsend	Hyattsville	MD
B Nordenholz	Silver Spring	MD
Meryl Pinque	Bangor	ME
Rosalind Ivens	Bucksport	ME
Debbie McCarthy	Phillips	ME
Tom Dykstra	Ada	MI
Catherine Madsen	Olivet	MI
Lisa Graham	Madison Heights	MI
David Daratony	Clarkston	MI
Donald Lintner	Crystal Falls	MI
Abby Harrison	Grand Rapids	MI
Twyla Douaire	Livonia	MI
Elenita Gliadon	Saint Cloud	MN
Jo Anna Heberger	Saint Paul	MN
Taylor Webber	Saint Louis	MO
Mark Caso	Gulfport	MS
Douglas Rohn	Bozeman	MT
Jennifer Brandon	Lexington	NC
Joseph R Deatherage	Bismarck	ND
Ulrike Silkey	Dickinson	ND
Aimee Williams	Albuquerque	NM
Peter Ware	Santa Fe	NM
William Huggins	Las Vegas	NV
Catherine Foley	Stony Brook	NY
Laura Pakaln	Nyack	NY

STAND TALL | OREGON



Walter Alton	Cherry Plain	NY
Mark Hollinrake	New York	NY
Claire Prevost	Granby	NY
Arifa Isabel	.	NY
Pamela Brocious	New York	NY
ANDREW ROBBINS	New York	NY
Joe Chwojdak	Cheektowaga	NY
Patricia Vineski	South Colton	NY
Ellen Dryer	Loveland	OH
David Cencula	Fairport Harbor	OH
David Greene	Columbus	OH
Michelle Rice	Olmsted Twp	OH
Kim Miceli	Newark	OH
Mercedes Lackey	Claremore	OK
mary more	Flourtown	PA
Jennifer Spengler	Northampton	PA
Jill Turco	Philadelphia	PA
Kate Gualtieri	Morton	PA
AnnMarie Sardineer	Trafford	PA
Lisa Scharin	Fountain Inn	SC
Lorna R	Florence	TX
Norma Feagin	Austin	TX
Susan Lefler	Livingston	TX
Pamela Miller	Tolar	TX
Richard Perkowski	Bluff	UT
Pamela Vasquez	Ogden	UT
Justin Velella	Vienna	VA
Elaine Becker	Roanoke	VA
richard jackson	Shelburne	VT

Jan. 3rd, 2024 Testimony - Washington County Commissioner Jerry Willey

Data calculated using latest modeling report to show impact of the proposed Habitat Conservation Plan on the 15 trust counties.

70-Year Habitat Conservation Plan

10-yr average harvest: 249 mmbf

10-yr average price/mbf: \$451 (sale price before project costs)

Current price/mbf: \$536 (sale price before project costs)

Harvest of HCAs is optional and only for the first 30 years.

Allocation of Revenue: ODF receives 37.25%; Counties receive 62.75%.

Impact on Schools: Approximately 65% of county dollars go to schools.

Impact on Public Safety: Approximately 10% of county dollars go to public safety.

10-yr avg (mmbf)	<u>HCA Harvest</u>		<u>No HCA Harvest</u>		<u>Total Average</u>
	249 <i>Highest</i>	249 <i>Lowest</i>	249 <i>Highest</i>	249 <i>Lowest</i>	
Table 3 (mmbf)	181	162	152	132	
Reduced Harvest (mmbf)	<68>	<87>	<97>	<117>	
10-yr avg Shortfall (millions \$)	\$30.60	\$39.20	\$43.70	\$52.70	\$41.55
<i>Impact on ODF (millions \$)</i>	\$11.40	\$14.60	\$16.30	\$19.60	\$19.40
<i>Impact on Counties (millions \$)</i>	\$19.20	\$24.60	\$27.40	\$33.10	\$26.15
Shortfall with Current Price (millions \$)	\$36.40	\$46.60	\$52	\$62.70	\$49.40
<i>Impact on ODF (millions \$)</i>	\$13.50	\$17.40	\$19.40	\$23.40	\$18.40
<i>Impact on Counties (millions \$)</i>	\$22.90	\$29.20	\$32.60	\$39.30	<\$31>

Good Morning Madam Chair and fellow board members. My name is Fred Yates and I am here to offer public comment on the proposed HCP. I reside in Cottage Grove located in Lane County.

You have spent 5+ years analyzing data, running computer simulations, tens of millions of dollars and hundreds of thousands of man hours to arrive at your conclusions. I have arrived at my conclusions by using your data from the last 110+ years. Your past data shows what has happened and what will possibly happen again. If you don't know your past history, you cannot stop it from repeating.

Your plan, all one thousand one hundred thirty two pages, filled with eloquent graphs, tables, figures, summaries and lots of verbiage **fails to address** any of the major shortcomings and questions we the people have proposed from the very beginning. The vast majority of our questions can be summarized into one simple question. What in the world has possessed ODF to contrive such a debacle?

Might this be the answer?

The numbers are out - and they are not good, they're terrible. It was revealed by Mike Wilson, ODF's Division Chief, that to cover the cost to manage our state forests they need to be harvesting at a much higher level and that the tax payers of Oregon will need to subsidize the management of a \$6 billion asset. Because of the HCP coupled with the new Forest Management Plan (FMP) will bankrupt a \$6 billion asset - BY CHOICE! ODF is NOT required to enter into the HCP (even though we're already operating under the HCP since summer and are seeing a 20% reduction in harvest). They want the HCP to fend off the continued lawsuits brought by Environment Groups - and in doing so will bankrupt our \$6 billion asset (Oregon's State Forest value).

It seems you are willing to throw Oregon's tax payers under the bus, burn down our state forest lands and wreak havoc on our GDP all because of a lawsuit. Ever hear of fighting back?

Your plan is a disaster in the making. A similar HCP has already bankrupted the Elliott State Forest, that had an estimated worth of \$1 billion. If all ODF forests are not quickly brought under proper stewardship it will result in multiple wildfires that will pump millions of tons of carbon into the atmosphere, destroy the very wildlife that you claim to be protecting, pollute the waterways with soot and ash and leave a desolate landscape that will take 70+ years to renew and become productive again.

If implemented your plan will cause the same exact devastation on the rest of ODF's managed forests that have an estimated worth of \$5 billion. Oregon's forests generate over \$18 billion of revenue, (both direct and indirect) to our economy and contribute over \$8 billion in GDP (3.7%) yearly. These forests have been a forever, renewable, source of revenue to Oregon's GDP since its founding.

There is an old, old adage – "If it ain't broke, don't fix it". Unfortunately your plan goes a step further and falls under the category of – Why break something that has worked for over 90 years?

I am appalled at how short sighted the BOF, the Legislature and the Executive Branch are. You are willing to throw away a perfectly, wonderful, source of forever, renewable, revenue that not only funds entities like rural fire departments, police services, sheriff services, emergency services, thousands of special taxing districts and also funds our school districts and creates thousands of jobs. You are throwing away free money. No it doesn't grow on trees, it is trees.

This HCP will cost numerous counties billions of dollars in direct and indirect revenues; it will decimate jobs in, around and connected with the forest. It will **FORCE** Oregon tax payers to make up the difference. Your job is

to work for the Oregon tax payers, not some cabal comprised of high government officials and special interest groups.

Furthermore, it seems that you are in direct violation of ORS 184.429 and are doing the exact opposite of what your charter demands.

ORS 184.429

Powers and duties of board

1) In addition to any other duties or powers provided by law, the Sustainability Board:

(a) Shall identify, evaluate, make recommendations and propose legislation, regulatory changes or policy modifications to agencies, the Governor, the Legislative Assembly, private entities or other bodies for the purpose of **encouraging activities that best sustain, protect and enhance the quality of the environment, economy and community for the present and future benefit of Oregonians.**

This is the start of looking at the past history and visualizing what the present holds for our state. Not a complicated table, but a very telling table. A quick summary of what has happened since the spotted owl debacle came into existence.

Forestry related jobs which produce economic gain to our state declined by 50%. As a consequence forest related products also declined, plain and simple. Obviously Oregon's GDP suffered a decline.

State & Local Government jobs increased by 32%. These jobs do not contribute to the GDP, they drain the GDP. They do not produce revenue.

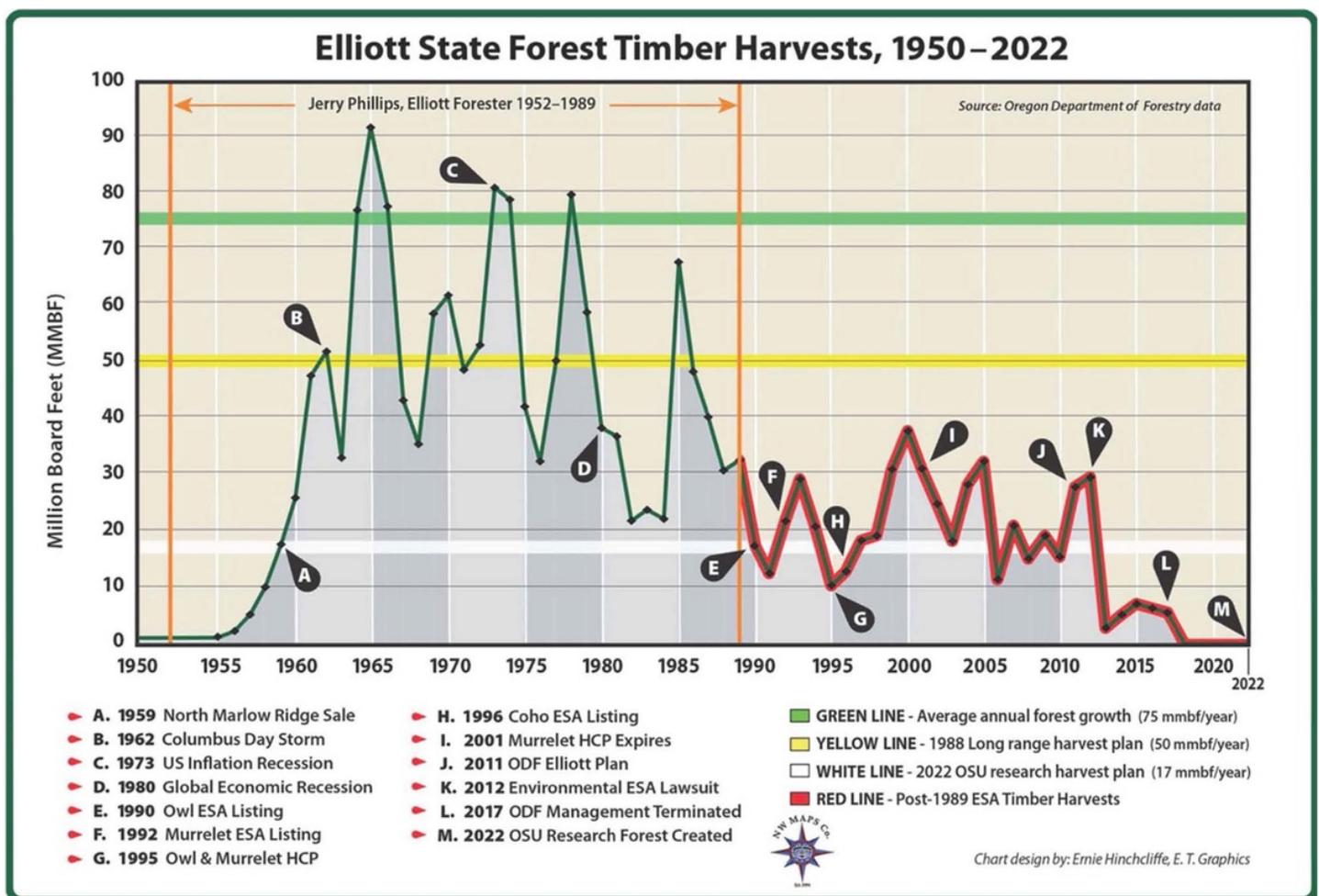
Job Description	1990 Jobs	2016 Jobs	Gained	Lost
Logging	11,300	6,000		5,300
Paper Manufacturing	8,900	4,200		4,700
Plywood & Engineered Wood Products	17,900	8,600		9,300
Sawmill & Wood Preservation	12,000	6,400		5,600
Forestry- Related Job Totals	50,100	25,200	0	24,900
Federal Government	34,000	28,300		5,700
State & Local Government	100,600	146,600	46,000	
State & Local Government Education	97,700	132,200	34,500	
Government-Job Totals	232,300	307,100	74,800	0

This table illustrates the great number of forestry jobs lost in Oregon since the listing of spotted owls as an Endangered Species in 1990. It also indicates the great increase in non-federal government jobs during the same period. In 1990 the ratio of private forestry jobs to government jobs was more than 1:5; since then the ratio has decreased to less than 1:12. Few forestry jobs require even a high school education because they are largely based on actual experience; conversely, a large percentage of government jobs require a minimum four-year college degree. This disparity is a strong indicator of the deepening urban/rural economic divide in Oregon with a basis in the 30-year "forest wars." Jobs data provided by Andrea Fogue, Oregon Employment

Oregon has led the nation for many years in producing softwood lumber, plywood and value-added engineered wood products used for home and office building. Implement this HCP and that will all disappear, our state GDP will sink lower and lower. All that revenue will be left lying on the ground, both literally and figuratively.

The next slide although it directly pertains to the Elliott State Forest is also a prime example of how to “see” what happened in the past and what happen if this plan is implemented. There is so much information represented in that slide that you need a little explanation to understand the beauty of it.

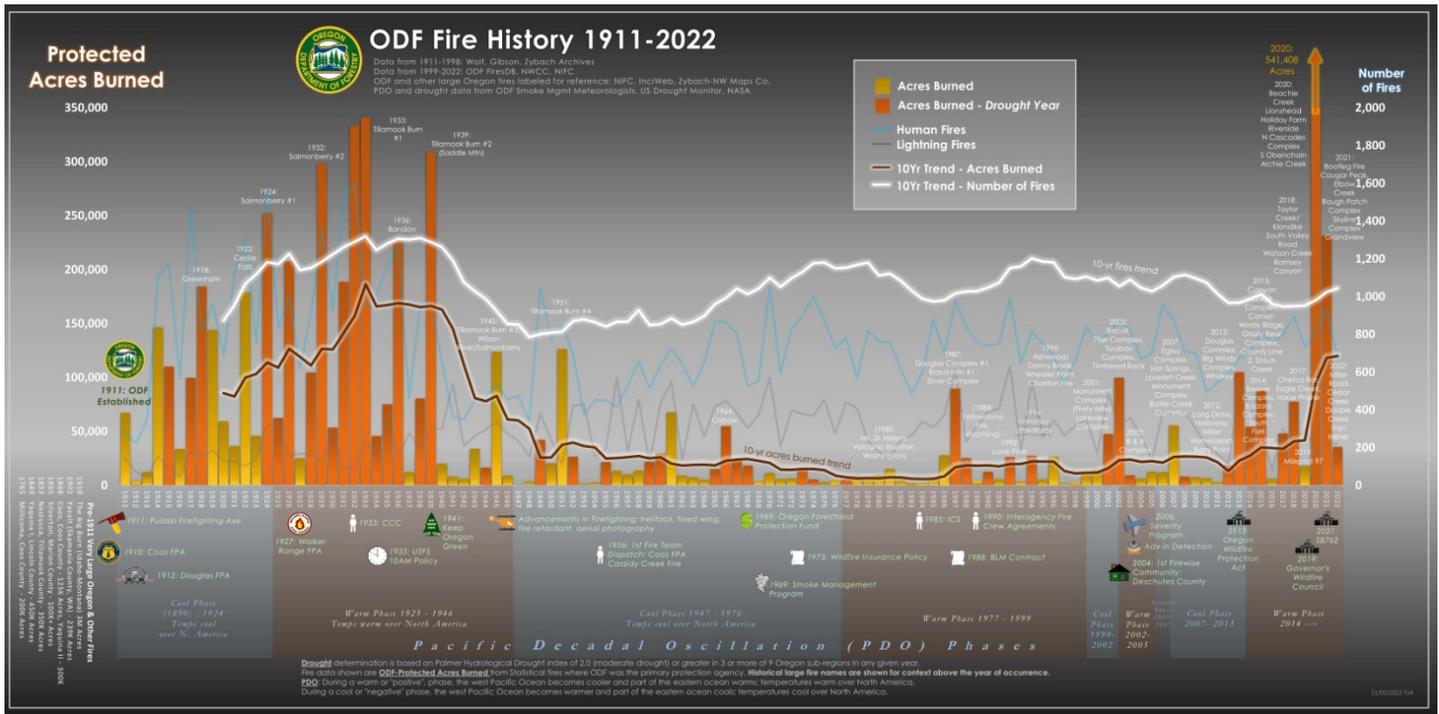
First all the little teardrops with letters are “the reason why” the graph changed slope. Second, the most important metric, is the difference between the straight green line at 75 MMBF and the widely diverging red graph line. That difference represents the accumulated amount of stored energy to burn down the forest.



**The Green Line represents average annual amount of growth of Elliott State Forest trees;
 The Yellow Line represents average allowable cut for the Elliott in the 1988 harvest plan;
 The White Line represents OSU's planned annual harvest of the Elliott w/ no snag salvage;
 The Area between the Green Line and Red Line represents Elliott fuel increases since 1989.**

Bottom line is that the Elliott grows 70-80 MMBF a year, there has been 0 MMBF sold in the last 8 years. This is an impending disaster waiting to catch fire and destroy how many more thousands of acres of adjacent forest lands?

The below information slide was created by ODF and chronicles the fire history of all of Oregon's Forests. It is both a look at the past 111 years, and a look at the future. Proper management must be implemented or this cycle will repeat over and over again.



Forests are a long term renewable crop. Like any crop they need the proper care, nurturing, weeding, fertilizing, and maybe pesticide spray. In return they offer a safe habitat for our wild life, they help moderate the temperature, they stabilize the land around them and they capture CO² and convert it into O² and store the carbon even when harvested. Plus they are an absolutely beautiful landscape to behold and a joy to walk through.

Although the opinion below was written about the Elliott State Forest during its HCP history, it contains extremely valuable knowledge that needs to read, understood and followed. If not, all the ODF managed forests will become a burden to the state; leaching money from the tax payers and contributing nothing in return.

The **Confederated Tribes of Coos, Lower Umpqua & Siuslaw Indians** on November 15, 2023 wrote this opinion about the Elliott “World Class Research” Forest project:

“Over time, these no-touch reserves will grow into an uninterrupted expanse of dark closed-canopy forest,” said Chair Kneaper. “These overgrown conditions lack diversity. They provide very little in terms of habitat for threatened species. They’re also prone to catastrophic, unnatural wildfire. These forests depend on human stewardship to maintain more open and diverse forest conditions, which benefits plants and animals as well as people.”

You should be listening to this voice of experience. These tribes, plus many more across this nation managed the forests for over 10,000 years and didn’t burn them to the ground. ODF was created in 1911. Its primary purpose is to manage our state forests in order to mitigate forest fires.