

From: [Brenna Bell](#)
To: [ODF DL Board of Forestry](#)
Cc: [Felice K](#)
Subject: Comments for today's special meeting
Date: Wednesday, February 15, 2023 3:31:58 PM
Attachments: [State forest HCP letter 2.15.pdf](#)

Please see the attached document in support of maintaining the proposed schedule for a robust HCP.

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Brenna Bell (she/her)
Forest Climate Manager, [350PDX](#)


"Even a wounded world is feeding us. Even a wounded world holds us, giving us moments of wonder and joy. I choose joy over despair. Not because I have my head in the sand, but because joy is what the earth gives me daily and I must return the gift."
— **Robin Wall Kimmerer**, [Braiding Sweetgrass: Indigenous Wisdom, Scientific Knowledge and the Teachings of Plants](#)



Oregon Board of Forestry
2600 State Street
Salem, Oregon 97310

February 15, 2023

Re: Comment for Special Board of Forestry Meeting Regarding the Western Oregon State Forest Habitat Conservation Plan

Dear Chair Kelly and Members of the Board of Forestry:

The climate crisis and the biodiversity crisis that face the world are inextricably linked. By shifting our management of Oregon's state forests, we can begin to address both of these crises. The Western Oregon State Forests HCP is a reasonable compromise plan that will stabilize harvest levels and provide durable protection for threatened and endangered species.

We strongly support a Western Oregon State Forest Habitat Conservation Plan (HCP) that is at least as protective as Conservation Alternative 3. The State Forest HCP lays out a long term plan to ensure that Oregon's state forests are managed for multiple values and for the greatest permanent value for all Oregonians while retaining timber harvest on state lands. In fact, the modeling of timber harvests under the HCP predicts greater harvest than under the no action alternative, in which continued litigation limits state forest harvests. Unless timber interests are presuming that they will be allowed to continue to violate the endangered species act, then it does not seem in their best interest to oppose the HCP.

There is so much public comment, development, and research that has gone into the draft HCP. It would be a total waste of effort to scrap it now, or to delay it and weaken it. The HCP before you has been developed with years of extensive public input. The courts have affirmed the state's right to manage for multiple benefits on state forests (*Linn Co. v. State of Oregon*). Now is the time to step up for Oregon's state forests, and for current and future generations, by adopting a strong HCP.

Thank you for your time and attention to this important issue,

Brenna Bell & Felice Kelly,
350 PDX Forest Defense Team

From: [Joshua Estes](#)
To: [KELLY Jim * ODF](#); [AGPAOA Liz * ODF](#); [CHAMBERS Karla S * ODF](#); [DEUMLING Ben * ODF](#); [FERRARI Chandra * ODF](#); [JUSTICE Joe * ODF](#); [MCCOMB Brenda * ODF](#); [MUKUMOTO Cal T * ODF](#); [ODF DL Board of Forestry](#)
Cc: [Sen Weber](#); [Sen Sollman](#); ["Chris McCabe"](#); gpallesen@awppw.org; [Sean O Sullivan](#)
Subject: AWPPW Comments on Habitat Conservation Plan
Date: Tuesday, February 14, 2023 5:16:07 PM
Attachments: [AF9D5D77AE214F46B44B18541E98A56F.png](#)
[HCP - AWPPW Comments .pdf](#)

Dear Chair Kelly and Members of the Oregon Board of Forestry,

Attached are comments from the Association of Western Pulp and Paper Workers Union (AWPPW) regarding the draft Habitat Conservation Plan for State Forests. We support and echo the comments submitted by the Northwest Pulp & Paper Association.

Thank you for your consideration.

Respectfully submitted via email,

Joshua Estes
AWPPW, Lobbyist OR/WA



Joshua Estes, SHRM-CP
Managing Partner, PNWRS



Email: josh@pnwrstrategies.com

Office: (425) 622-8256

Office Hours: Monday - Friday 9am to 6pm
Saturday By Appointment / Sunday Closed



February 14, 2023

Chair Kelly and Honorable members of the Oregon Board of Forestry,

Please accept these comments which are being submitted on behalf of the Association of Western Pulp and Paper Workers Union (AWPPW). The AWPPW represents thousands of members in Oregon, Washington and California. The Habitat Conservation Plan (HCP) for State Forests, in its current form will place our members livelihoods at risk.

We appreciate the hard work that has gone into this proposal, but we respectfully request that the board make the necessary changes to the draft now, before going any further into the process.

We are in full support and echo the comments submitted by the Northwest Pulp & Paper Association on February 14, 2023. *The current draft HCP would set aside 55% of forest for land for habitat, leaving less than half of the forest for active management. This will result in a 34% reduction in harvest from ODF predicted levels under this HCP – a significant decrease in the available fiber supply. As drafted, the HCP will have far-reaching consequences for several key industries and lasting impacts on mills in Oregon and Washington.*

Our jobs are on the line. Please take the time to get this right!

Respectfully,

Josh Estes

Josh Estes
Lobbyist, OR/WA
Association of Western Pulp & Paper Workers
Email: [REDACTED]
Phone: [REDACTED]

Cc:
Sen. Suzanne Weber
Sen. Janeen Sollman




From: [Darlene Chirman](#)
To: boardofforestry@oregon.gov
Subject: Comments for Special Board of Forestry session 2/15/2023
Date: Tuesday, February 14, 2023 3:01:04 PM
Attachments: [BOF Motion to delay HCP Broads 2023-2-14.pdf](#)

Chair Kelly and Board of Forestry—

Please accept the attached comments regarding the motion to delay the HCP on the agenda for February 15th, on behalf of the Cascade Volcanoes chapter of the Great Old Broads for Wilderness.

Sincerely, Darlene Chirman

Darlene Chirman


Portland OR 




February 14, 2023

Board of Forestry
submitted via email: boardofforestry@oregon.gov

RE: Motion to delay HCP

Dear Chair Kelly and members of the Board of Forestry

The Great Old Broads for Wilderness is a non-profit organization dedicated to the protection of our public forests. This letter is submitted on behalf of the Cascade-Volcano chapter, based in NW Oregon (Portland) and Southern Washington, commenting on the Motion to delay progress on the Habitat Conservation Plan for the Western Oregon State Forests (HCP). The goal of the HCP is to provide long-term protection for the covered species that are listed or candidates for listing under the federal Endangered Species Act, while providing regulatory certainty for timber harvest and lower costs for endangered species management.

The Great Old Broads strongly supports the HCP and urges the board to proceed with implementation of the HCP without delay. We urge selection of Alternative 3 as most likely to support covered species over the term of the permit period with anticipated increased climate change impacts.

Delay in implementation of the HCP would extend the awkward period of managing Western State Forests under the existing Forest Management Plan, but the Department of Forestry cannot in good faith plan harvests in areas designated as Habitat Conservation Areas and Riparian Conservation Areas under the future HCP. Without Incidental Take Permits, all planned timber sales must undergo expensive monitoring for listed threatened and endangered species and revise harvest plans to avoid of harm when they are found. This is a major reason why the Board and Department of Forestry sought the HCP in the first place.

Our understanding is that the delay of the HCP is sought due to estimates of 20% reduction in harvest in the interim Implementation Plans under development. However, the one draft Implementation Plan (IP) we have reviewed to date, for the Tillamook District, does not show this. Appendix A shows a Harvest Modeling Analysis, modeling of sustainable harvest over 150 years, incorporating the draft HCP, the draft IP, the current Northwest Oregon State Forest Management Plan and came up with a Modeled Harvest Volume of 82.9 MMBF. On review this was adjusted to 75.3 MMBF, due to problems in the model. This was determined by district staff to still be unrealistically high, and was revised to a range of 47-52 MMBF, due to factors such as

inoperable areas and landslide risks. The IP harvest level was set at “the previous IP level of 47 MMBF”. Additional harvest was anticipated when “the Incidental Take Permit takes effect.”

Our previous comments on the Habitat Conservation Plan have recommended that the Conservation Areas be co-managed for endangered species habitat and recovery and as carbon reserves. This could limit impacts of the Climate Change and Carbon Plan (CCCP) approved in November 2021 on production stands. In the absence of an approved HCP, the Board of Forestry can anticipate demands for implementation of the CCCP which could have greater impacts on harvest volume, with potential higher retention of older trees and longer harvest rotations.

We urge the Board of Forestry to move forward with implementation of the Habitat Conservation Plan for the Oregon Western State Forests.

Sincerely,



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

From: [Theresa Dursse](#)
To: [ODF DL Board of Forestry](#); [MUKUMOTO Cal T * ODF](#)
Cc: ["David Yamamoto"](#); ["Davis, Lindsay"](#); [GOODY Dan B * ODF](#); [Patty Jo Angelini](#); [Matt Phillips](#); [Courtney Bangs](#); [John Toyooka](#); [Lianne Thompson](#); [Mark Kujala](#); [Pamela Wev](#)
Subject: Habitat Conservation Plan concerns
Date: Tuesday, February 14, 2023 10:42:51 AM
Attachments: [BoFF HCP with attach.pdf](#)

Board of Forestry,

Please accept this letter of concern regarding the Western Oregon State Forest Habitat Conservation Plan for the Clatsop County Board of Commissioners.

Theresa Dursse
Senior Administrative Supervisor
Clatsop County Manager's Office
800 Exchange St., Ste. 410
Astoria, OR 97103
Office: 503-338-3621
Mobile: [REDACTED]

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Clatsop County

Board of Commissioners

800 Exchange St., Suite 410
Astoria, OR 97103
(503) 325-1000 phone / (503) 325-8325 fax
www.co.clatsop.or.us

February 14, 2023

Oregon Board of Forestry
260 Stat Street
Salem OR 97310

Dear Board of Forestry,

Clatsop County supports the development of the Western Oregon State Forests Habitat Conservation Plan (HCP). The current version, however, raises a number of significant implications/concerns for our rural community, that include:

- Reducing local government revenues (with no viable path to replace locally);
- Reducing local government services and service levels, including first responders, schools, healthcare, public transportation and other vital government services;
- Eliminating family-wage timer jobs;
- Reducing activity and viability of other local businesses;
- Impacting the social fabric of our community, including schools, healthcare, not-for-profits and civic organizations

The 2021-25 Implementation Plan (IP), released on February 2, 2023, reflects a reduction of habitat of nearly 35% from levels previously predicted by the Oregon Department of Forestry as part of the HCP development process. This IP confirms our worst fears and is further evidence that the HCP process is not fairly and equitably balanced environmental, economic and social considerations. As the County most impacted by the IP – our citizens need to be heard and redressed.

[The recently released IP is the "worst case scenario" for taxing jurisdictions, businesses, schools and other social and civic structures in our community.](#)

[It will impact our community's health and well-being for generations to come. We deserve better.](#)

Total Projected Impacts on Clatsop County Taxing Jurisdictions

35% reduction in annual timber revenues – with no (or limited) upward adjustments over time

County-wide taxing jurisdiction Annual Impacts based on 5-year average receipts (2016/17 to 2020/21):

| | |
|---------------------------------------|---------------------|
| Clatsop County | \$2,9999,000 |
| Schools (K-12) | \$4,468,000 |
| Community College | \$ 566,000 |
| Clatsop Care Health District | \$ 227,000 |
| Sunset Empire Transportation District | \$ 98,000 |
| Port of Astoria | \$ 76,000 |
| Rural Fire | \$ 33,000 |
| Sunset Parks and Recreation District | \$ 12,000 |
| City of Astoria | \$ 4,000 |
| Total Annual Reduction | \$ 8,483,000 |

Clatsop County Financial Impacts Based on Recent ODF Projections

Clatsop County Annual Impacts based on 5-year average receipts (2016/17 to 2020/21):

| County Taxing Jurisdiction | Annual Revenue Reduction Per Fund | As a % of Total Annual Revenues |
|-------------------------------------|--|--|
| Clatsop County Discretionary | \$1,813,000 | 8% |
| Rural Law Enforcement | \$ 434,000 | 15% |
| Road District #1 | \$ 614,000 | 15% |
| State Land Enforcement – Sheriff | \$ 76,000 | 38% |
| Extension/4-H | \$ 32,000 | 7% |
| Fairgrounds | \$ 30,000 | 5% |
| Total Annual Reduction | \$2,999,000 | |

Summary of Potential Impacts by Service Area for Clatsop County:

Public Safety and Justice

Estimated annual impact - \$1,416,500

| | |
|--|-----------|
| Discretionary Funding to Public Safety and Justice | \$906,500 |
| Rural Law Enforcement | \$434,000 |
| State Land Enforcement | \$ 76,000 |

The \$1,416,500 is equivalent to roughly 12.0 FTE (a reduction of nearly 10% from current staffing levels).

General Government

Estimated annual impact - \$906,500

Funds Assessment and Taxation, Clerks Office (Elections and Recording), Internal Services, Parks, Community Development and other General Fund departments.

The \$906,500 is equivalent to roughly 8.0 FTE (a reduction of nearly 10% from current staffing levels).

Public Works – Road Maintenance-

Estimated annual impact - \$614,000

Reduce funds available to maintain and repair roughly 232 miles of roadway, including bridges, culverts and other infrastructure. Pavement Condition Index will degrade over time; increasing costs of maintenance/repair.

Extension/4-H

Estimated annual impact \$32,000

Reduce funds available for programming and services related to administrative staff, operational expenses and program supplies.

Fairgrounds

Estimated annual impact - \$30,000

Reduce funds available for repair/maintenance of Fairgrounds property and facilities.

In Conclusion

Beyond the devastating financial impacts on local governments (an estimated \$8.5 million annual reduction), the County is also concerned about the broader economic and social implications of the HCP. According to the Oregon Forest Resources Institute, eleven (11) jobs are created in Oregon for every million board feet of timber harvested. It is also estimated for every \$1 million of

ODF timber revenue generated, an additional \$1.2 million is generated for local forest sector businesses who log, haul and mill the timber.

Rural communities need more family wage job creators – not less. Timber provides vital discretionary revenues to local governments **and** the industry supports a wide range of family-wage jobs, businesses and philanthropic activities.

Family-wage jobs are the cornerstone of a healthy and sustainable community. The HCP process must study and consider the impacts of job loss and government service reductions on our rural economy prior to approval. We urge the board to reflect on the fact that Clatsop County does not have the transportation system and developable lands (including industrial) that can make up for the loss of timber supported family-wage jobs. The state needs to examine all impacts of the HCP (environmental, economic and social) since its ramifications will impact this community for generations.

Decoupling local government financing from timber harvest (assuming the State agrees to offset local government revenue loss), will not ameliorate the impacts of reduced timber harvest on our local and regional economy.

Good public policy is founded on a broad consideration of interrelated and interdependent factors; the HCP must consider and balance this myriad of factors to produce a framework that protects and safeguards Clatsop State Forest and the broader community.

We request that the state postpone the approval of the HCP and reengage with local elected officials to prepare a plan that is more nuanced, equitable and sustainable for the health and well-being of this community.

The Clatsop County Board of Commissioners is committed to work with the Oregon Department of Forestry to this end.

We can do better.

Sincerely,



Mark Kujala, Chair
Clatsop County Board of Commissioners

Attachment



HABITAT CONSERVATION PLAN IMPACTS TO CLATSOP COUNTY

Clatsop County supports the development of a Western Oregon State Forest Habitat Conservation Plan.

But, the current version has significant implications for our rural community.



A 35% reduction in annual timber revenues – with no upward adjustments over time is the “worst case scenario” for taxing jurisdictions, businesses, schools and other social and civic structures in our community.

In rural communities like Clatsop County, we need more family wage job creators – not less. Timber provides vital discretionary revenues to local governments and the industry supports a wide range of family-wage jobs, businesses and philanthropic activities.

↓\$1.4M

PUBLIC SAFETY & JUSTICE

Reduce discretionary funding to Public Safety and Justice \$906,500
Rural Law Enforcement \$434,000
State Land Enforcement \$76,000



↓\$900K

GENERAL GOVERNMENT

Reduce funds for Assessment and Taxation Clerk's Office (Elections and Recording), Internal Services, Parks, Community Development and other General Fund departments.



↓\$600K

PUBLIC WORKS

Reduce funds available to maintain and repair roughly 232 miles of roads, bridges, culverts and other infrastructure.

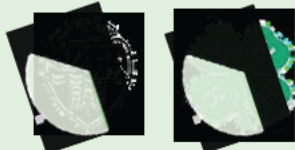
Pavement Condition Index will degrade over time; increasing costs of maintenance/repair.



↓\$32K

4H / EXTENSION

Reduce funds available for programming and services related to administrative staff, operational expenses and program supplies.



↓\$30K

FAIRGROUNDS

Reduce funds available for repair & maintenance of Fairgrounds property and facilities.



Total Impact

Annual Revenue Reduction for Clatsop County

↓\$3M

Family-wage jobs are the cornerstone of a healthy and sustainable community. The HCP process must study the impacts of job loss on our rural economy prior to approval. We urge the board to consider the fact that Clatsop County does not have the transportation system and developable lands (including industrial) that can make up for the loss of timber supported jobs. The state needs to examine all impacts of the HCP since its ramifications will impact this community for generations.



Postpone the approval of the HCP and reengage with local elected officials to prepare a plan that is more nuanced and equitable.



This will impact the people in our community's health and well-being for generations to come. We deserve better.

From: [Daniel Nava](#)
To: [HUNTINGTON Geoff * GOV](#)
Cc: [ODF DL Board of Forestry](#)
Subject: Washington County's Support for the HCP
Date: Tuesday, February 14, 2023 10:29:21 AM

Mr. Huntington and Board of Forestry,

Ahead of tomorrow's meeting I just wanted to re-submit the Washington County Board of Commissioner's support for the HCP dated September 7th and their desire for the board of forestry to adopt the HCP.

In Service,

Daniel Nava, MPS/MA | Senior Staff Assistant to Chair Kathryn Harrington

Pronouns: he/him/his

Washington County Administrative Office

155 N First Ave, Ste 300

Hillsboro, OR 97124-3072

 | www.washingtoncountyor.gov

Daniel_Nava@washingtoncountyor.gov

INFO: Washington County email addresses has changed from @co.washington.or.us to @washingtoncountyor.gov. Please update my contact information.



September 6th, 2022

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

Re: HCP/DEIS

Dear Board Members:

Washington County has been following the Board of Forestry's work on the Habitat Conservation Plan (HCP) and Draft Environmental Impact Study (DEIS). On June 2, 2022, the Washington County Board of Commissioners convened a roundtable and discussed the HCP/DEIS and its impact on the 45,514 acres managed as forest land in our county.

The Washington County Board of County Commissioners appreciates the work the Board of Forestry has done through the HCP/DEIS in balancing the many interests of our state and the need to comply with the Federal Endangers Species Act. Washington County, like the state, has consistently supported forest management to support sustainable timber harvest, ample recreation, protected wildlife and their ecosystems, and clean water.

In advance of your Sept 7th, 2022, meeting, please know I and the undersigned district commissioners **support the HCP/DEIS** as an admirable balance of varied interests and is consistent with the county's previous position as stated in county Resolution and Order 13-27 supporting the Board of Forestry's efforts to implement conservation areas and modernize forestry policy.

I and the undersigned district commissioners **encourage the Board of Forestry to adopt the proposed action of approving the HCP** which will give certainty to a sustainable timber harvest,

Board of County Commissioners
155 North First Avenue, Suite 300, MS 22, Hillsboro, OR 97124-3072
phone: (503) 846-8681 • fax: (503) 846-4545



protect habitats, preserve our forests, clear air and water resources, and give our people ample recreation opportunities here in Washington County and throughout our state.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kathryn Harrington".

Kathryn Harrington, Chair,
Washington County Board of Commissioners

A handwritten signature in brown ink, appearing to read "Nafisa Fai".

District 1 Commissioner Nafisa Fai

A handwritten signature in blue ink, appearing to read "Pam Treece".

District 2 Commissioner Pam Treece

From: [Megan McKibben](#)
To: boardofforestry@oregon.gov
Subject: Letter from Commissioner Willey - for tomorrow's board meeting
Date: Tuesday, February 14, 2023 8:58:50 AM
Attachments: [JW Testimony for BOF meeting 2.15.pdf](#)

Good morning,

Please find the attached letter from Commissioner Willey in regards to tomorrow's special meeting of the Board of Forestry. If you have any questions, please let me know. Thanks,

Megan

Megan McKibben | Staff Assistant to Commissioners Treece & Willey

(She/Her/Hers)

Washington County Administrative Office

155 N 1st Ave., Suite 300, MS-21, Hillsboro, OR 97124

megan_mckibben@washingtoncountyor.gov

Mobile: [REDACTED]

INFO: Washington County email addresses has changed from @co.washington.or.us to @washingtoncountyor.gov.
Please update my contact information.



February 15, 2023

VIA EMAIL (boardofforestry@oregon.gov)

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

RE: Comments on proposed fiscal 2024 through 2025 Implementation Plan

Today I am writing to express my deep concern with the Oregon Department of Forestry's (ODF) proposed fiscal 2024-2025 Implementation Plan (IP). From what I understand of the proposed IP, should it be implemented, our special districts in Washington County will be severely undermined financially.

I agree with the need for a Habitat Conservation Plan (HCP) and believe that a thoughtfully crafted and collaborative HCP has the power to eliminate frivolous lawsuits that hurt families working in our forests and living in our rural communities. It can further ensure the continuous flow of much relied upon funding from harvest revenue dispersed to our special districts. Washington County may not rely heavily on the funding from ODF, but I am speaking right now on behalf of those special districts that do.

Without a background in science, I cannot debate the modeling used by ODF. What appears unsettling though, is the drastic reduction in projected harvest levels from ODF's Business Case Analysis of the HCP in 2018 to present day. Harvest levels are now 24 % lower than originally projected. These varying numbers show me that we have no clear grasp on the full impacts of the HCP, a 70-year plan. We could potentially be destroying the timber industry completely, which does not meet Greatest Permanent Value.

While my concern is for our special districts, family wage jobs in the forest, and ensuring that Oregon continues to have a timber industry, I am also concerned for ODF itself. The proposed IP would significantly cut the budget for the department, and that seems self-sabotaging.

Realizing I am not alone in my concerns, I truly hope that ODF revisits the HCP, and this time in partnership with the trust land counties. There is no reason to rush a 70-year plan that has the potential to be this devastating to our state.

Sincerely,

Jerry Willey
Washington County Commissioner, District 4

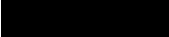
Board of County Commissioners
155 North First Avenue, Suite 300, MS 22, Hillsboro, OR 97124-3072
phone: (503) 846-8681 • fax: (503) 846-4545

From: [Bodie Dowding](#)
To: [ODF DL Board of Forestry](#)
Subject: 2-15-2023 BOF Comments
Date: Tuesday, February 14, 2023 10:53:28 AM
Attachments: [2-15-2023 BOF Comments Bodie Dowding.docx](#)

Please find my written comments for the 2-15-23 BOF meeting attached.

Thank you,

Bodie Dowding
Oregon Log Buyer
Pacific Fibre Products



Bodie Dowding
Oregon Log Buyer
Pacific Fibre Products

2/13/2023

Oregon Board of Forestry and State Forester Cal Mukumoto,

As a recent employee of ODF who left on good standing on 1/13/23, I have a somewhat unique view of ODF. It is full of good people but I have often heard very negative false statements about the timber industry from ODF, especially at high levels of leadership. I heard time and again that industry only cares about making money and buying logs for as cheap as possible. This is a false, narrow view of the forest industry. We love and are concerned for the health of our communities and are proud of the role we play in the lives of those who work in the industry and their role in the communities they live in. Personally, it breaks my heart to think of the jobs that are lost and the effects on families when forest products companies go out of business. I would appreciate an effort by ODF and the BOF to understand how the majority of the forest products industry cares about the communities we live and work in. I have a few things I ask you to consider when making decisions about the HCP.

- From 2006 to 2015 Oregon State Forests harvested 56% of net growth, 18% of net growth succumbed to mortality, and 26% of net growth remained as an increase in net volume on the forest (<https://oregonforests.org/node/626>). The HCP has been touted as necessary to grow habitat for wildlife but the current forest management plan is already doing this at an astounding rate of 26% of net growth.
- ODF generated IP modeling that went out for public comment in February 2023 used current FMP restrictions and HCP restrictions for the first 5 years of the modeling period to model non-declining even-flow harvest. After the initial 5 years of the modeling period, only HCP restrictions were used. With the modeling time frame (I believe 70 years), this is basically a model of timber output under HCP restrictions and no significant increase in volume can be expected if current FMP restrictions are lifted from the model.
- The forest products industry in Oregon operates at equilibrium with the timber supply. Clear proof of this can be seen by the mill shutdowns in Southern Oregon that followed shortly after logging stopped on the Elliot State Forest. The average mill in Oregon uses about 55 mmbf of logs a year. With current State Forest harvest levels of 255 mmbf per year and likely harvest levels of 170 mmbf per year under the HCP as illustrated by recent IP modeling, at least one and likely two mills tributary to state forests will be closed. Many people only look at the closure of a mill, but this is devastating to the communities these mills reside in as the spending by employees goes away and the businesses supported by the mill either go out of business or scale back.
- Carbon has been a major consideration in BOF conversations but there has been an unwillingness to consider the impact of substitution (using wood instead of steel or concrete) on net carbon output by ODF staff and the BOF. The Oregon State government continually talks

about a lack of housing. The solution to a lack of housing is to build more housing and wood is the most environmentally friendly building material that can be used. I ask you to urge ODF staff to model substitution when modeling carbon storage and output for the upcoming Forest Management Plan.

Thank you for taking the time to read this.

Sincerely,

Bodie Dowding

[REDACTED]
[REDACTED]

From: [Branden Pursinger](#)
To: [OLIVOS-ROOD Hilary * ODF](#)
Subject: Testimony for Special BOF from FTLAC Chair
Date: Wednesday, February 15, 2023 6:50:22 AM
Attachments: [Chair Yamamoto Testimony 2.15.pdf](#)

Hilary,

Attached is the Testimony for Chair Yamamoto. We understand there will not be in person testimony taken for today's Special BOF meeting, so pursuant to ORS 526.156, please find this written testimony attached.

Thank you and please let me know if you have any questions,
Branden

--

Branden Pursinger
Legislative Affairs Manager
Association of Oregon Counties
a: 1212 Court St NE, Salem, OR 97301
o: 503.585.8351 m: [REDACTED]
e: bpursinger@oregoncounties.org
w: www.oregoncounties.org

February 15, 2023, Board of Forestry Testimony

Chair Kelly, members of the Board of Forestry, State Forester Mukumoto, Staff: I am David Yamamoto, Tillamook County Commissioner and Chair of the Forest Trust Land Advisory Committee (FTLAC). I am here today representing FTLAC in order to fulfill our statutory responsibility to advise the BOF and the State Forester on matters which affect management of the State Forest Lands (ORS 526.156).

Board members, why did the BOF call a special board meeting today? After at least 4 years of Habitat Conservation Plan (HCP) development, why do we need this meeting? I believe it due to failure – failure to maintain public trust.

Board members, throughout the development of the HCP, ODF has not been forthright. ODF produced a business case analysis to justify the need for an HCP showing harvests levels averaging nearly 250 MMbf per year over a 50-year period. Once the department had board approval to develop an HCP, the department immediately produced a plan with significantly lower revenue generating potential than the business case analysis, without showing any benefits of the plan.

After ODF developed the plan behind closed doors and applied to the Federal Services for an HCP, the Services released a draft environmental impact statement. This statement showed harvest levels of about 225 MMbf per year. ODF told us that this harvest level is not much different from recent harvest levels, that we should not be concerned, and that this was a much better outcome than what would occur without an HCP. The HCP was described at that time as being essential to achieving Greatest Permanent Value. However, even as ODF was reporting numbers from the environmental impact statement, staff were planning further modeling for the Implementation Plan and Forest Management Plan knowing that these models would contain additional constraints and that additional constraints result in lower harvest levels.

Nonetheless, we were assured that Forest Management Plan modeling would result in harvest levels very similar to the levels reported in the environmental impact statement. Therefore, I was surprised, and I suspect you were too, by harvest level projections as low as 165 MMbf per year, fully 27% less than the environmental impact statement and 33% less than the business case analysis. I have to wonder if ODF was surprised by these results. If not, it blatantly shows how ODF has misled you, the Counties, and the public. If so, it shows how willing ODF was to ignore the needs of the Counties and the requirements under Greatest Permanent Value when developing the HCP.¹

The financial impact to the Counties and Special Tax Districts of the projected 35% drop from recent harvest levels² will be catastrophic. It is undeniable that harvest levels under the Implementation Plan will result in layoffs of public service providers including police officers, teachers, social workers, and emergency services staff. In addition, workers in fully benefited family wage jobs in the timber industry and support services will lose their jobs at a time when no similar jobs exist in our rural Counties.

¹ OAR 629-035-0020(1) contains a list of social, economic, and environmental benefits included in Greatest Permanent Value, (a) is Sustainable and predictable production of forest products that generate revenues for the benefit of the state, counties, and local taxing districts.

² The average harvest level from 2012 through 2021 was 255 MMbf/yr.

However, the information provided by ODF is not adequate for individual Counties and Special Districts to fully assess the impacts. ODF has presented harvest data at only district level, but not the County level. Since districts do not match County boundaries, Counties and Special Districts are unable to properly assess impacts to their budgets and essential services.

The HCP will also gravely impact ODF's own budget. You all know, the department has a history of poor financial management. State Forests Division revenue under the HCP will fall 34%, commensurate with the drop in harvest volume, more if timber prices continue to fall. In addition, due to inflation, costs will be up from past years. At the same time the Governor is requesting agencies plan for 10% budget cuts. This will strain the ODF budget. Without an adequate budget, the department is likely to fail to produce even the meager volume in these projections and will lose vital State Forests staff who participate in the fire program, greatly reducing ODF's ability to respond to and manage wildfire. I do not have to remind you that Oregon is facing increasingly devastating wildfires. In the face of this, it is irresponsible to layoff so many talented fire fighters.

Board, ODF has failed to maintain public trust in forest land planning. The department has not given you, the Counties, or the public a forthright explanation of HCP, Implementation Plan, and FMP planning. ODF is instead making decisions behind closed doors with the Federal Services, ODFW, and DEQ. When you or the Counties have asked for more information about the impacts of the HCP, ODF hides behind excuses. ODF claims a lack of involvement in the environmental impact statement and points to artificially compressed timelines—timelines ODF has not hesitated to extend to suit its own needs.

Further, an essential aspect of maintaining public trust is allowing for analysis and comment by affected partners and stakeholders. The rushed scheduling and lack of public testimony at this special meeting exemplify the problems with this process. Implementation Plan modeling has proven that ODF's previous statements on impacts of the HCP were incorrect. Instead of taking the time to identify and rectify incorrect assumptions, ODF (and the BOF) seem intent on charging ahead with existing plans.

For these reasons, we cannot support this HCP and are quickly losing faith in the ODF's ability to manage State Forest Lands for the Counties and the public under Greatest Permanent Value. We cannot support a system where ODF can claim it is managing for Greatest Permanent Value while harvest levels fall significantly from past analyses, and the board does not hold ODF to account.

Board, you must stop this disregard for public trust. You must demand ODF produce an HCP and Forest Management Plan that accounts for Greatest Permanent Value, that maintain County and Special District budgets to provide essential services, that provide timber to support fully benefitted, family wage jobs in our rural Counties, and that maintain ODF's budget so that the department can retain staff to fully implement planned harvest levels, while remaining available to fight Oregon's increasingly damaging wildfires.

We demand that you reject the proposed HCP on account of failure to provide for management consistent with Greatest Permanent Value.

From: [Tyler Gilmore](#)
To: [ODF DL Board of Forestry](#)
Subject: Written Comment for 2/15/23 Meeting on Motion to Delay HCP
Date: Wednesday, February 15, 2023 7:47:44 AM
Attachments: [Comment on Motion to Delay HCP Tyler Gilmore.pdf](#)

Hi there,

Thank you for all your time, energy, and effort. It does not go unappreciated. Please see attached for your meeting tomorrow (Wednesday, 2/15/23).

Tyler
he/him/his
Forest Defense Team Volunteer Co-Lead

Board of Forestry
submitted via email: boardofforestry@oregon.gov
RE: Motion to delay HCP

Dear Chair Kelly and members of the Board,

First, thank you for your time, energy, and attention in this critical time for our forests and survival. I am a lifelong northwesterner, having been born in northern Washington, and lived in the Portland area since I was roughly two years old. I have a personal love for the trees and the birds they house - both serving as really emotionally and spiritually grounding beings for me during turbulent times. **The forests have taken on another meaning to me over the years, though, due to the climate crisis: survival. Please manage the forests for maximum benefit to the Oregon Public.**

It has been well-established that our forests here in Oregon provide many benefits, including truly exceptional carbon sequestration.¹ The US Forest Service even explicitly states the importance of forests in things as simple as clean drinking water: "Forests provide drinking water to more than 150 million people in the U.S."² At a time when the climate crisis is truly becoming a matter of life and death - recall that due to the 2021 heat dome, "hundreds of people died across the Northwest, and at least 96 people died in Oregon"³ - we must be mindful of how our (1) forests prevent increased frequency of these extreme heat events through carbon sequestration, (2) provide immediate relief from many effects of extreme weather (i.e., having clean-water to drink) when they do happen, and (3) provide habitat to our neighbors whose survival, like ours, is seriously threatened:

- Oregon Coast Coho
- Oregon Coast Spring-Run Chinook
- Lower Columbia River Chinook
- Lower Columbia River Coho
- Columbia River Chum
- Upper Willamette River Spring-Run Chinook
- Upper Willamette River Winter Steelhead
- Southern Oregon/Northern California Coast Coho
- Southern Oregon/Northern California Coastal Spring-Run Chinook
- Eulachon
- Northern Spotted Owl
- Marbled Murrelet
- Oregon Slender Salamander
- Columbia Torrent Salamander
- Cascade Torrent Salamander
- Coastal Marten
- Red Tree Vole, North Oregon Coast Population

"They're just animals," some might say. I respond with, "so are we."

Ultimately, the Habitat Conservation Plan is not anti-logging and neither am I: we need wood. The house I'm writing this from within is made of wood. My room has wood floors and I have a wood table in front of me. But, **we must be mindful of how we obtain and maintain the timber resource so that we do not create wealth in timber and poverty in clean air and water, and ecological stability.** It is a delicate balance, but one that is absolutely necessary and worthwhile to pursue.

And better yet, I believe it's very much possible to achieve an Oregon in which timber communities are economically thriving, they are no longer taken advantage of by Wall Street or wealthy investors with no stake in the health of Oregon communities, and our forests can thrive alongside them. This would not only provide the timber communities with steady income for generations to come with forests that will continue to thrive, but it would provide all of us with the clean drinking water that our lives very literally depend on. In fact, Coast Range has even created a proposal that includes just treatment of timber communities and forests alike.⁴

I believe the organizations telling timber communities to oppose the HCP do not truly have the best interests of the timber communities in mind. It seems they are more concerned with short-term profit for a select few wealthy people, not even the timber communities.

Example: I find it startling and disappointing that just one person (the CEO of Weyerhaeuser) can be compensated \$12.7 million annually^{5,6,7} while the state receives \$97.3 million annually⁸. One person is getting \$13.1% of what an entire state (4.2 million people⁹) are getting. At that rate of compensation per person, the state revenue should be \$53.3 trillion annually, 548,201 times what it is now. He received more compensation than each of Marion, Linn and Clackamas counties⁸. I see a discrepancy in the way our profits from timber are distributed. Our forests have plenty of potential to financially support local economies - the money is just going elsewhere.

May we collectively see through the gaslighting, acknowledge the life-or-death situation we find ourselves in, and make a just transition to economic and forestry practices that include thriving trees *and* timber people *and* other people *and* other non-human animals. It's all possible and just depends on our decisions.

Truly, thank you for your time and attention in reading my comment. This matters - it really does.

Tyler Gilmore
350PDX Forest Defense Team, Volunteer Co-Team Lead
[REDACTED]
Portland, OR [REDACTED]

References

1. <https://www.fs.usda.gov/research/news/highlights/pacific-northwest-coastal-rainforests-sequester-tons-carbon-literally>
2. <https://www.fs.usda.gov/features/forests-faucets-where-does-your-drinking-water-come>
3. <https://www.opb.org/article/2022/09/28/pacific-northwest-heat-wave-2021-oregon-summer-weather-heat-dome-climate-change/#:~:text=The%20heat%20wave%2C%20known%20as,had%20no%20air%20conditioning%20units.>
4. <https://coastrange.org/gnd-proposal/>
5. [https://simplywall.st/stocks/us/real-estate/nyse-wy/weyerhaeuser/management#:~:text=CEO%20Compensation%20Analysis&text=Compensation%20vs%20Market%3A%20Devin's%20total,45M\).](https://simplywall.st/stocks/us/real-estate/nyse-wy/weyerhaeuser/management#:~:text=CEO%20Compensation%20Analysis&text=Compensation%20vs%20Market%3A%20Devin's%20total,45M).)
6. <https://www.erieri.com/executive/salary/devin-stockfish-a0oh>
7. <https://aflcio.org/paywatch/WY>
8. <https://www.opb.org/article/2022/12/13/oregon-state-forests-deliver-more-than-97m-in-timber-revenue/>
9. <https://www.census.gov/quickfacts/OR>

From: [Knox Marshall](#)
To: [ODF DL Board of Forestry](#)
Cc: [KELLY Jim * ODF](#); [AGPAOA Liz * ODF](#); [DEUMLING Ben * ODF](#); [CHAMBERS Karla S * ODF](#); [FERRARI Chandra * ODF](#); [JUSTICE Joe * ODF](#); [MCCOMB Brenda * ODF](#); [MUKUMOTO Cal T * ODF](#)
Subject: Written Comments For 2_15_2023 Board Of Forestry Special Meeting
Date: Tuesday, February 14, 2023 4:16:41 PM
Attachments: [Oregon Board of Forestry Draft Written Comments 2_15_2023_ver001.pdf](#)

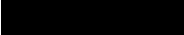
Greetings

Please see attached written comments as a follow up to the two minute verbal testimony provided.

Thank you for your consideration.

Please do not hesitate to contact me if you have questions. I look forward to any discussion the Board Members may want to have.

Best regards,

Knox Marshall
Vice President of Resources
Murphy Company




February 15, 2023

Oregon Board of Forestry
Oregon Department of Forestry Headquarters
2600 State Street
Salem, Oregon 97310

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

My name is Knox Marshall, and I am the Vice President of Resources for Murphy Company located in Eugene, Oregon. Please accept these written comments, Agenda Item 1, 2/15/2023 Board of Forestry Special Meeting.

Again, worth mentioning is the format of this meeting among others that are likely to come in the future. Public comments are necessary for the Board members to hear first-hand opinions outside the confines of public service offices what stakeholders find to be most important in relation to topics being considered for policy changes. I am fearful that the Board is further diminishing the need for these important public processes. A change in this style of governance is necessary to obtain an open and transparent process for the benefit of all of the concerned citizens on this subject. Continued actions by the Board without further consideration to the importance of the impacts of these decisions to the rural communities of Oregon is tone deaf and in no means equitable to all of the stakeholders.

I would again like to suggest that when the Board is considering major policy changes with impacts that are so significant and have such lasting duration, that a different format be adopted. I urge the Board to consider a special session with a balanced panel of stakeholders, or develop a Technical Advisory Committee with experts in the subject matter to advise Board Members on the all of the cumulative impacts from proposed policy changes. Washington State has developed a process to inform their management department so that expertise including vast University representation is tapped to inform processes fully when as complex and important as an HCP process.

Murphy Company is dependent on the Oregon State Land's timber sales to run our veneer plants and make the highest grade engineered wood products found anywhere on the planet. Murphy employs over 900 people and is a leading producer of hardwood and

softwood plywood as well demanded in high volume right here in Oregon. The timber offered by the ODF into the marketplace is critical to our milling infrastructure and seeing the projected reduction in harvest does not give us great hope that our locally and sustainably grown engineered wood products will be substituted with imports from other countries. Grown local doesn't seem to be the focus in this HCP modeled harvest reduction. Again, as the Board considers options for the State Forests, it should be recognized that impacts to the highly regulated domestic producers will decline, and wood products will be imported to meet the shortfall in supply. As Oregonians it is our responsibility to sustainably manage all forest lands for the perpetual outputs that meet the goals for the global environment and not transfer our environmental responsibility to countries with far less strict policies. The demand for wood products will continue to grow as they become globally recognized for their positive benefits to climate change, and Oregon will choose to source its needs from imports. We will become more reliant on fossil fuels to move these products potentially half way around the globe to deliver to the citizens of Oregon.

We appreciate that the Board of Forestry is being careful in all its assumptions to maintain a viable industry for equity towards the rural communities of Oregon while considering the future management of the State Forests. The Board of Forestry should direct the ODF management to draft more scenarios around maintaining the sustainable harvest levels they have been at over the last five years of 250 MMBF or greater understanding that the biological productivity is substantially higher. The growing of inventory while maintaining the harvest level will add more habitat to sensitive species over time improving the outlook for all objectives the HCP will be addressing. The HCP as presented will be setting aside more acres than needed when considering the cumulative impacts globally by requiring the imports to replace sustainably produced products right here in Oregon. Perpetually managing the state forests for sustained production of forest products is the best scenario looking at all the potential impacts that need to be considered when addressing such a complicated global system. The decisions made on the trajectory of these forests is critical to our state's future as a provider of raw materials for our societies needs and all the ecological contributions managed forests provide.

If you have any questions, please call me at [REDACTED].

Sincerely,



Knox Marshall
Vice President Resources
Murphy Company

From: [Jackie White](#)
To: [KELLY Jim * ODF](#); [AGPAOA Liz * ODF](#); [CHAMBERS Karla S * ODF](#); [DEUMLING Ben * ODF](#); [FERRARI Chandra * ODF](#); [JUSTICE Joe * ODF](#); [MCCOMB Brenda * ODF](#); [MUKUMOTO Cal T * ODF](#); [ODF DL Board of Forestry](#)
Cc: [Sen Weber](#); [Sen Sollman](#); [Chris McCabe](#)
Subject: NWPPA Comments on Habitat Conservation Plan
Date: Tuesday, February 14, 2023 2:51:19 PM
Attachments: [NWPPA BOF HCP Comments.pdf](#)

Dear Chair Kelly and Members of the Oregon Board of Forestry,

Attached are comments from the Northwest Pulp & Paper Association (NWPPA) regarding the draft Habitat Conservation Plan for State Forests.

Thank you,

Jackie White

Director of Regulatory and Technical Affairs
Northwest Pulp & Paper Association
300 Deschutes Way S.W., Suite 201
Tumwater, WA 98501
(360) 529-8638 w
[REDACTED] c
www.nwpulpanpaper.org



Northwest Pulp & Paper
ASSOCIATION

Submitted via email.

February 14, 2023

Dear Chair Kelly and Members of the Oregon Board of Forestry,

Thank you for the opportunity for the Northwest Pulp & Paper Association (NWPPA) to provide feedback on the draft Habitat Conservation Plan (HCP) for State Forests. NWPPA is a 67-year-old regional trade association representing ten member companies and 14 mills in Oregon, Washington and Idaho, five of which are located in Oregon. Our member mills in Oregon provide 4,000 union-backed, family wage jobs in some of Oregon's more rural, economically distressed communities. Mills provide a 3:1 job multiplier and are often the single largest taxpayer in these communities, a large portion of which is distributed as funding for schools and emergency services.

NWPPA member mills utilize wood fiber in two significant production applications. The first is the use of wood chips as a key raw material in the manufacturing of pulp and paper. The second is the use of hog fuel in the generation of green power.

The draft HCP would set aside 55% of forest land for habitat, leaving less than half of the forest for active management. This will result in a 34% reduction in harvest from ODF predicted levels under this HCP – a significant decrease in the available fiber supply. As drafted, the HCP will have far-reaching consequences for several key industries and lasting impacts on mills in Oregon and Washington.

We ask that the Board make the necessary changes to the draft now, before going any further into the process. It is vital that these changes increase harvest levels closer to previous projections. The HCP has a 70-year implication – it is crucial that the Board take the time to consider an alternative that balances economic and social values in combination with the sustainability of the HCP.

Thank you for your time and consideration.

Sincerely,

Jackie White
Director of Regulatory and Technical Affairs
Northwest Pulp & Paper Association

cc:

Sen. Suzanne Weber
Sen. Janeen Sollman

From: [Carol Valentine \(via Google Docs\)](#)
To: [ODF DL Board of Forestry](#)
Subject: OR Sierra Club comment to BOF 2-15-23
Date: Wednesday, February 15, 2023 10:04:49 PM
Attachments: [OR Sierra Club comment to BOF 2-15-23.pdf](#)

Carol Valentine attached a document



Carol Valentine ([REDACTED]) has attached the following document:

Please see attached comment to the Board for 2/15/23, agenda item 1.

Thank you,
Carol Valentine



OR Sierra Club comment to BOF 2-15-23

Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

You have received this email because [REDACTED] shared a document with you from Google Docs.





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To: Chair Kelly and the Board of Forestry

From: Oregon Chapter Sierra Club

Date: February 15, 2023

Subject: Support the Western Oregon State Forests HCP

The Oregon Chapter Sierra Club, representing 74,000 members and supporters, urges you to stand firm on adopting a Habitat Conservation Plan (HCP) that is at least as protective as Alternative 3. Oregon stakeholders who care about our state forests are solidly in the majority when it comes to a balanced management approach for our state forests. They know the importance of protecting salmon, wildlife habitat, clean water, and carbon storage, and Alternative 3 represents such an approach.

The process for establishing an HCP has been carefully followed and analyzed. For two years, scientists have worked with ODF to design the conservation locations within the HCP. Alternative 3 will promote a more ecologically-focused model of forestry, will reduce annual Endangered Species Act compliance costs, and protect our older-aged stand of timber. Still, within almost 30% of the 272,00 acres of Habitat Conservation Areas established under Alternative 3, the Oregon Department of Forestry would be permitted to conduct some active forest management..

At a November 16, 2022 Board of Forestry meeting in Seaside, many people voiced their support for Alternative Three. At least three quarters of those who gave oral testimony spoke about the health of our planet and the importance of forests as critical to addressing the climate crisis. They also spoke of the necessity to provide needed wildlife habitat and the importance of protecting our soils and water quality.

We ask you to *not* weaken the proposed HCP to appease the timber industry. They have had their day in court. We know that the practice of industrial logging on public and private lands degrades forest ecosystems, drives climate change, contributes to water shortages and more severe wildfires, and threatens endangered fish and wildlife species.

Thank you for your consideration of these comments, and for your dedication to the wellbeing of Oregon's forests and communities.

Carol Valentine, Forest Team Coordinator
Conservation Committee
Oregon Chapter Sierra Club

From: [REDACTED]
To: [ODF DL Board of Forestry](#)
Subject: Comments on HCP discussion
Date: Tuesday, February 14, 2023 4:33:37 PM
Attachments: [Oregon Board of Forestry HCP.docx](#)

Please accept the attached comments from sport anglers and professional fishing guides and sportfishing related businesses for the Special Meeting of the Board of Forestry dated February 15, 2023 and provide them to the Board and the staff of the State Forest Division prior to the meeting.

Thank you.

Bob Rees, Executive Director
NW Guides and Anglers Association
Publisher, The Guide's Forecast
www.TheGuidesForecast.com
[REDACTED]

Oregon Board of Forestry
2600 State Street
Salem, Oregon 97310

Submitted via email

Dear Chair Kelly and Members of the Board:

We wish to express our concern for the direction you may be giving to the Oregon Department of Forestry in drafting the Western Oregon State Forest Habitat Conservation Plan. Any deviation on forward progression in implementing a strong HCP compromises the recovery of depleted wild salmon and steelhead species our community depends on, that are grown on state forest lands.

Last year, the take of wild fall Chinook salmon was **CLOSED** in the entire Tillamook Basin, due to depressed numbers of adults returning to the watershed, and we're facing **ANOTHER CLOSURE** for the fall 2023 season as well. These closures in the Tillamook and constraining opportunities in other north coast watersheds severely compromised a \$200 million dollar a year industry that depends on abundant fish and wildlife in Tillamook and Clatsop Counties. Furthermore, the adult steelhead returns of 2022 and clearly this year, are severely down, causing concern for the long-term viability of this species and the recreational opportunity our community once enjoyed. In the last two decades, we've never witnessed so little opportunity to pursue salmon and steelhead on the North Coast, it's an indication that we have a critical problem.

The North Coast's wild salmon and steelhead are a forest product too, a product that seems to be disappearing off of the land and waterscape. We believe Alternative 3 of the Habitat Conservation Plan will address the needs of these fish, and give them a chance to recover, along with the North Coast recreation economy. Sportanglers are deeply frustrated that our community is forced to sit on the sidelines when solutions to recovery repeatedly fail to get implemented. We are facing yet another petition for the listing of Chinook salmon under the ESA on the north coast, why would we perpetuate such a listing when we have a solution at our fingertips? We are at a crossroads with the Habitat Conservation Plan.

It is for this reason, we urge the board and agency to continue forward momentum in implementing the HCP and to seek the maximum protections modeled under **Alternative 3** providing "increased conservation" for species of concern. Long gone are the 40, 50 and 60-pound Chinook the Tillamook State Forest used to produce, and in many cases, we're failing to meet minimum spawning escapement goals for several runs of wild salmon.

In Gratitude,

Bob Rees, professional fishing guide, Bay City, Oregon

Elias Pickard, sport angler, St. Helens, OR

John Buessler, sport angler, North Plains, OR

Chad Sewell, sport angler, Carlton, OR

Jeff Cosgrove, sport angler, Portland, OR

Steven Bowker, sport angler, Happy Valley, OR

Jim Rowse, sport angler, Stayton, OR

Jim Bendickson, sport angler, Manzanita, OR

Len Schelsky, sport angler, Tualatin, OR

Bryan Hutcheson, sport angler, Beaverton, OR

Mark Scarpaci, sportfishing related business, Ashland, OR "Save the fish!"

Alberta Wygle, sport angler, Springfield, OR "Protect our salmon runs!!! Now!!

Kenneth Kay, sport angler, Portland, OR "It is way passed time to protect our waterways and our wildlife. Just look at how much Tillamook Bay has filled in the last 50 years. Most of the silt is coming from logged areas that will not hold water when it rains. Make the restrictions a law."

George Barton, sport angler, Oregon City, OR

Ian Embry, sport angler, La Center, WA

Leonard Meyer, sport angler, Portland, OR "Stream protection and a properly managed forest that doesn't put short term profits first should be an easy decision."

Joseph Terleski, sport angler & owns a sportfishing related business, Gresham, OR

Jay Layton, sport angler, Aurora, OR

Jeff Ratzi, sport angler, Banks, OR "I support a data/ common sense plan that balances both fish conservation and forestry"

Richard, Ackerman, sport angler, Stayton, OR "Agreed that a Habitat Conservation Plan is needed for the Rivers and Tillamook Bay. Also should advocate HATCHERY BROOD FISH programs."

Steve Brodehl, sport angler, Salem, OR

Richard, Corwin, sport angler, Elkton, OR

John Mclaughlin, sport angler, Salem, OR

Roger Goodwin, sport angler, Dallas, OR

Rob Bignall, sport angler, Buckeye, AZ

Bradley Ray, sport angler, Vancouver, WA

Pete Reseter Jr. sport angler, Portland, OR

Mike Lawrence, sport angler, Milwaukie, OR

Roger Staver, sport angler, Portland, OR “I am a lifetime Oregon Resident - I started fishing with my Dad when I was 4 years old, and have continued fishing since then. I have watched as have many other sportsmen, the continuing degradation of Salmon & Steelhead runs over 75 years! Please be aggressive in implementing a REAL solution to this ongoing problem.”

Don New, sport angler, Portland, OR “I urge the board and agency to continue forward momentum in implementing the HCP and to seek the maximum protections modeled under Alternative 3 providing “increased conservation” for species of concern.”

Brad Pease, sport angler & owns a sportfishing related business, Tigard, OR

Gary Nylander, sport angler, Vancouver, WA “Do what is right for the environment and our iconic fish runs.”

Jeff Iverson, sport angler, Clackamas, OR

Thomas Barnes, sport angler, Creswell, OR

Dana Ross, sport angler, Corvallis, OR “We need to do all we can to help RESTORE our wild fish populations, not damage them further.”

Christopher Coffman, sport angler, Portland, OR

Wade Keenon, sport angler, Wilsonville, OR

Jeffrey Nicol, sport angler, Portland, OR “We need to be playing the long game here. Sport anglers have minimal environmental impact, and a huge positive impact to local, rural economies. Time to get priorities straight to support the fishery and the fisherpeople”

Donald, Shiarla, sport angler, Keizer, OR

David Mierkey, sport angler & owns a sportfishing related business, Stockton, CA

Mark Mapes, sport angler, Rigby, ID “HCP Now!!!”

David Cummings, sport angler, Cornelius, OR “I have spent hundreds of dollars buying gear, and maintaining a boat to enjoy the outdoors fishing. The least you could do is to make sure we have a chance at catching a few fish each year.”

Greg Kraus, sport angler, Portland, OR

Nick Donovan, sport angler, West Linn, OR “Please think about the Salmon/Steelhead more than the money aspect!!”

Thomas Brown, sport angler, Neotsu, OR

David Thompson, sport angler, Forest Grove, OR “Again the foresters are defending logging practices for money and destroying a different part of our world.”

Jeffrey Stefanick, sport angler, Portland, OR “I witnessed the clear cutting of the two hills on either side of the Wilson River in 1992-93 the river completely changed after filling up with silt and small gravels. The water quality after the rains was horrible - from a little color to a Chocolate in a few hours.”

David Schaerer, sport angler, Portland, OR “We need to do everything possible to give our runs of salmon and steelhead a chance to recover. We're at a critical juncture!”

Donald Harp, sport angler, Canby, OR

Stephen Tappert, sport angler, Troutdale, OR

Ian Carter, sport angler, Woodland, WA

Victoria Stenerson, sport angler, Hillsboro, OR

Jonathan Berkompas, sport angler, Yacolt, WA

Tim Gibson, sport angler, Boise, ID

Thomas Sheridan, sport angler, Newberg, OR

George Goodman, sport angler, Newberg, OR

Larry Potter, sport angler, Oregon City, OR “It’s way past time to protect our stream corridors.”

Matt Cechovic, sport angler, McMinnville, OR

David Doble, sport angler, Canby, OR

Mike Bellmore, sport angler, Eugene, OR “Please continue to enhance preservation measures related to timber extraction activities in salmonid streams and habitat.”

Tom Coffey, sport angler, West Linn, OR “The future of Salmon and steelhead is on the edge of extinction. This is not the time to abandon conservation measures. What will be the legacy of your decision, how will it effect the cultural landscape of the Tillamook basin.”

Daniel Colish, sport angler, Damascus, OR

James Summers, sport angler, Damascus, OR

Richard Murie, sport angler, Vancouver, WA “One industry should not be allowed to prosper at the expense of another.”

Gregory Parrott, sport angler, Sherwood, OR “We must increase streamside protection on all of our anadromous rivers.”

Gino Streano, sport angler, Portland, OR

Mike Bernard, sport angler, Camas, WA

Mark Erskine, sport angler, Meridian, ID “The disappearance of Tillamook salmon and steelhead is deeply troubling. Having grown up fishing for these fish I’ve witnessed them shrink in both size and population over the last 3 decades. There are tolls available (broodstock) being one of them, that have been proven to be instrumental in providing a healthy fishery. I urge the considerable use of all tools at your disposal tip revive and save this great fishery and resource.”

Ronald Edgerton, sport angler, West Linn, OR “The teachers union and the timber industry has been successful in hampering fish conservation strategies for decades. Now is the time to implement or completely lose wild salmon on the North coast of Oregon!”

Gregory Reed, sport angler, Portland, OR

Primo Williams, sport angler, Portland, OR “Save our salmon and steelhead!”

Jack LaRue, sport angler, Rickreall, OR

Garrett Smith, sport angler, Oregon City, OR

Josh Harrel, sport angler, St. Helens, OR

Thomas Snider, sport angler, Klamath Falls, OR “Stop the over-reach of government!”

Davorian Fundak, sport angler, Oregon City, OR

Jim Nowodworski, sport angler, Damascus, OR

William Bauer, sport angler, Madras, OR

David Butts, sport angler, Gold Hill, OR “Yes, the legislatures need to know that we need scientifically based conservation!”

Rod Harris, sport angler, Newberg, OR

Brian Strand, sport angler, Oregon City, OR

Ed Wright, sport angler, Milwaukie, OR “Really! So the timber industry is purposefully causing strife on the local economy! I know we did not go to Tillamook last year and spend money at the local sporting goods store, hotels, grocery store, a fishing guide, the cheese factory and other places. That had to hurt when me and thousands of sport anglers don't spend their money in the Tillamook area!”

Michael Suchocki, sport angler, Gladstone, OR “Help us improve the habitat for fish!”

Richard Carr, sport angler, Gearhart, OR

Carlos Villagran, sport angler, Eugene, OR

Brian Otis, sport angler, Tigard, OR

Mark Linder, sport angler, Sonoma, CA “Save our fishing!”

Garin Duffield, sport angler, Portland, OR

Terry Donovan, sport angler, Gladstone, OR

Erik Moberly, sport angler, Waldport, OR

Nick Fernandes, sportfishing guide, Nehalem, OR

Lieven Rudd, sport angler, Oregon City, OR “Other areas need to be managed too. We need to manage or have better rules for gillnetting which can destroy runs too. We also although I hate killing anything just to kill it need to manage the seals. Too many of them now.”

Clay Gordon, sport angler, Camas, WA “We need legislation and action that will compel industries that have a negative impact on our rivers and streams to do more to protect the resources our citizens enjoy.”

Gerald Berndt, sport angler, Rockaway Beach, OR

Stephen Gettel, owns a sportfishing related business, Milwaukie, OR “This is a no-brainer for the future of children!”

Russ Butkus, sport angler, Portland, OR

Bob Southwick, sport angler, Silverton, OR

Neil Burniston, sport angler, West Linn, OR

Richard Zettervall, sport angler, Creswell, OR “I’m a 70 year sports angler who has fished for Salmon in the entire Tillamook Bay watershed my entire adult life. Please support the HCP under Alternative 3. The entire fishery suffered due to poor timber practices. Please listen to the Sport anglers, they have an outstanding proposal that needs your full support!”

Jerry Allen, sport angler, Salem, OR

Ray Smith, sport angler, Neotsu, OR “It’s time for Oregon to join the rest of the west coast with responsible timber harvest regulations.”

David Smith, sport angler, Portland, OR

Jeff Rome, sport angler, Grants Pass

Bill Erdle, sport angler, Oregon City, OR

Nicolai Miller, sport angler, Milwaukie, OR

Tim Wilson, sport angler, Milwaukie, OR

Thomas Havens, sport angler, Carlton, OR

James, Livingston, sport angler, Monmouth, OR “I am also a OSU trained Forestry graduate and Forest Recreation minor. I believe forestry and recreation can co-exist when managed wisely. Stream buffer zones and forest management for water quality are a part of good forest management.”

Paul Kalkman, sport angler, Sherwood, OR

Stevan Jovanovic, sport angler, Portland, OR “Protect our fish!”

Phillip Roberts, sport angler, Milwaukie, OR

Aaron Bento, sport angler, Beaverton, OR

Dan Puffinburger, sport angler, Sisters, OR

Don Pierce, sport angler, West Linn, OR

Jan Herron, sport angler, Aurora, OR “I think if the fisherman the cannery’s and the guides are in the fish program, we would have plenty of fish get rid of the fish commission or who’s ever making all these bad decisions.”

Larry Clevenger, sport angler, Elkton, OR “What are you doing with all the funds you collect there’s no hatchery fish to catch. In fact you haven’t rebuilt. Many of the hatchery’s that have been damaged. Get with it. I’ll get a different job. Unless somebody in there that will do something.”

James Frank, sport angler, Portland, OR “Save our fish and stop killing the forests, thanks!

Milan Apeltauer, sport angler, Aumsville, OR “It’s sad to see the gradual degradation of environment resulting from natural resource extraction. I think we should do all we can to protect environment first and chase the dollars only after adequate protection measures are in place.”

Fred Wensenk, sport angler, The Dalles, OR

Norman Ritchie, sport angler, Gresham, OR

Joe Stark, sport angler, Gaston, OR

Blaine Ackley, sport angler, Hillsboro, OR

Steven Buelna, sport angler, Durham, OR

Thomas Hinkle, sport angler, Lake Oswego, OR

Grant Zadow, sport angler, Tualatin, OR “I support do everything to give fish habitat the priority.”

Michael Whitmore, sport angler, Milwaukie, OR

Bill Lauer, sport angler, Corvallis, OR

Louis Dersch, sport angler, Bend, OR

Nico Kau, sport angler, Beaverton, OR

Andre Frasin, sport angler, Portland, OR

Richard Wros, sport angler, West Linn, OR

Jeffrey Keightley, sport fishing guide, Astoria, OR

Peter Hollomon, sport angler, Beaverton, OR

Michael Sones, sport angler, Portland, OR

Dan Durbin, sport angler, Salem, OR

Jamie Ramey, sport angler, Beaverton, OR “I am a sport angler and outdoor enthusiast having spent a lot of time in the Tillamook State Forest. I have also worked in the timber industry for more than half of my working career. Unfortunately, I have observed even compliant cuts negatively impact water quality and spawning beds. Oregon is blessed with abundant natural resources—clean water, salmon, and forests. All three are connected; only forests (timber) are renewable and they are renewable only to the extent that the management plan considers all impacts, whether intentional or not. This is supported by science, but . Without changes to existing forest practices, I may never see one of those 50# Tillamook hogs again. The fate of water, salmon, and the forests is at stake. We need clean water. We need salmon. We need timber. We need to start managing them effectively or all three will be lost forever. We are the last generation with the potential to save or completely destroy our environment, natural resources, and the economy of Oregon.”

Jeff Flatt, sport angler, Warren, OR “Act now to save our salmon. I want my grandkids to be able to enjoy this precious commodity for many years to come.”

Garry Phillips, sport angler, Milwaukie, OR

Doug Kelsey, sport angler, Creswell, OR “It’s past time to do more, extinct is forever and is robbing our next generations from a healthy outdoor experience”

Jesse Zalonis, sport fishing guide, Hebo, OR

Robert Kelso, sport angler, Oregon City, OR “Protect fish habitat!”

Darryl Phillips, sport angler, Springfield, OR

Michael Scott, sport angler, Camas, WA

Joel Aylor, sport angler, Terrebonne, OR “I have been in support of action to protect streams and water ways forever, I agree with the statement if not now when ? Fish can no longer take a back seat to logging.”

David Shuldes, sport angler, Tillamook, OR “I fully support implementing Alternative 3 of the Habitat Conservation Plan.”

Matt Keikkala, sport angler, Oregon City, OR “Keep the promise of streamside reparations for the health of our steelhead & salmon populations!”

David Caney-Peterson, sport angler, Aloha, OR “We need to protect our lands and rivers for our grandchildren not only for today’s timber industry to profit and move on.”

Robert Pitts, sport angler, Junction City, OR “I’m in the Forest Products Industry and I’m also a strong advocate for sustainable, conservation minded logging practices. This is a no brainer to help keep our watersheds vibrant and healthy enough to not only sustain current populations of salmon and steelhead but to grow them. This will ensure that future generations get to enjoy the fishing opportunities that we’ve all obviously taken for granted.”

Austin Gower, sport angler, Tualatin, OR

Mike Struloeff, sport angler, Bay City, OR “Do more to bring back our salmon!”

Marcus Spencer, sport angler, Kellogg, ID

Troy Everest, sport angler, Clackamas, OR

Matt Davey, sport angler, Clatskanie, OR “The only industry that doesn’t have to comply by environmental rules stop the timber industry now!”

Bob Miller, sport angler, St. Helens, OR

Mark Harguth, sportfishing related business, Bay City, OR

Les Day, sport angler, Hillsboro, OR

Lee Richey, sport angler, Tualatin, OR “Please do not delay in implementing the HCP and avoiding further depletion and possible destruction of a valued and valuable salmon/steelhead run.”

John Mace, sport angler, Portland, OR

Christopher Curn, sport angler, Kennewick, WA

+ 183 additional signers as of 4:18 p.m. on 2/14/23. A subsequent email will follow in the coming days with a total cache of signers.

From: [Rep Javadi](#)
To: [ODF DL Board of Forestry](#)
Subject: Question for the Board Meeting
Date: Wednesday, February 15, 2023 12:38:14 PM
Attachments: [image001.png](#)

Board Members,

The HCP, as proposed, will devastate the both the local county government, as well as, the local economy. I'd appreciate your thoughtful consideration of the following questions during today's meeting:

How does the proposed reduction in the total harvest from Oregon's State Forest, and the massive potential negative impact on the local economies, align with the principles of the Greatest Permanent Value doctrine and the state's obligation to manage its forests sustainably, taking into account the economic, social, and environmental factors involved? And, what measures are the Oregon Department of Forestry considering to support the local community and mitigate any negative economic effects, while still meeting the state's obligation to manage its forests sustainably?



Cyrus Javadi DDS

State Rep. HD-32 | Tillamook County, Clatsop County, City of Clatskanie
Capitol Office: (503) 986-1432

Please note that all email sent to and from this account is subject to disclosure under public records laws, and may be viewed by HD-32 legislative staff.

From: [Sen Weber](#)
To: [ODF DL Board of Forestry](#)
Subject: BOF Agenda February 15, 2023 Item #1
Date: Tuesday, February 14, 2023 4:06:29 PM
Attachments: [Senator Weber letter to Board of Forestry HCP 20230214.pdf](#)

Board of Forestry,

Please accept my written testimony RE: BOF February 15, 2023 Agenda item #1 Wester Oregon State Forest Draft HCP Discussion.

Thank you,

Sen Suzanne Weber

Senate District 16

Rural Northwest Oregon

503-300-4493



January 24, 2023

Chair Kelly and Board of Forestry members:

The Oregon Department of Forestry's (ODF) recently released Implementation Plans are a clear indication that the Habitat Conservation Plan (HCP) for State Forests is turning out to be a bad deal for Oregon.

I represent Oregon's 16th Senate District, which covers Clatsop, Tillamook, Columbia, and parts of rural Washington and Multnomah counties. Schools, colleges, teachers, public safety officials, mill workers, loggers, healthcare providers, business associations, restaurant owners—I'm hearing from them all. They're deeply concerned about the impact harvest reductions under the proposed HCP will have on their communities. As a former teacher and mayor in Tillamook County, I share their concerns.

The Astoria district alone will see harvests reduced from 73 million board feet (MMBF) to 48-52 MMBF a year. The Forest Grove district harvest levels drop from 61 MMBF to 43-47 MMBF annually. This represents a 30-34 percent decrease in revenue and economic opportunity for our communities. In Clatsop County, the Sheriff's office is facing an annual budget decrease of about \$1.4 million under this HCP, which will likely result in the loss of a dozen employees and 24-hour coverage in local communities. The counties and the taxing districts know that demand for public services will only increase in the coming years and that timber dollars will be needed more than ever.

The people who live and work in my district also know very well that the problem with this HCP isn't just the detrimental impact to ODF timber revenues and county distributions. Schools that receive timber dollars also have students who are supported by parents and family members who work in the forest sector. **ODF timber harvests support working families.** State Forests provide a source of logs that are prohibited from export, which means they are critical to maintaining sawmill infrastructure. **ODF timber harvests support our local wood manufacturing sector.** Businesses from equipment outfitters to coffee shops know many of their customers work in the woods and in the mills. **ODF timber harvests support our small businesses.** We only have to look to our neighbors in Southern Oregon who are still reeling from the shutdown of harvests on federal forests 30 years ago to see what hardships lay ahead for us if this plan moves forward as is.

I have no doubt that ODF staff have toiled long and faithfully on this HCP. But you have the facts now. This is not the plan that was proposed two years ago. This is not the plan my constituents want.

The Board has a duty not only to the environmental interests that have backed this plan, but also to the communities and workers who rely on these lands and the economic benefits and opportunities they provide. I urge the Board to direct ODF staff to take what they have learned and assemble an amended HCP that increases harvest levels to the original target range of 250mmbf annually. Have them examine various scenarios and harvest levels and resubmit these amended plans to the agencies for analysis. Give yourselves some options. Give all Oregonians a chance for a more balanced plan. Current and future generations of Oregonians shouldn't get stuck with a bad plan just because the agency didn't have the foresight to examine a full range of options when it had the chance.

In closing, I want to be clear that if the Board does not do its due diligence with this plan and direct ODF to take practical and necessary steps to address shortcomings that are now so obvious, I will make sure my colleagues in the legislature know just how unnecessary and avoidable I consider the ensuing self-inflicted hardships and budget shortfalls to be. With the significant housing and social welfare needs in this state, if ODF thinks requests for additional tax-payer assistance will be well-received, it should think again. Fix this, please

Regards,

A handwritten signature in black ink that reads "Suzanne Weber". The signature is written in a cursive, flowing style.

Senator Suzanne Weber
Oregon Senate District 16

From: [Michael Lang](#)
To: [ODF DL Board of Forestry](#)
Subject: Conservation Comments Board of Forestry Special Meeting 2.15.2023
Date: Tuesday, February 14, 2023 2:36:38 PM
Attachments: [Joint Comments - Board of Forestry Special Meeting 2.15.23.pdf](#)

Please accept the attached comments from State Forest Coalition member groups to the Board of Forestry for the Special Meeting of the Board of Forestry dated February 15, 2023 and provide them to the Board and the staff of the State Forest Division prior to the meeting.

Thank you.

Michael Lang
Oregon Policy Senior Program Manager
Wild Salmon Center




Submitted via email

February 14, 2023

Oregon Board of Forestry
2600 State Street
Salem, Oregon 97310

Re: Comment for Special Board of Forestry Meeting Regarding the Western Oregon State Forest Habitat Conservation Plan

Dear Chair Kelly and Members of the Board of Forestry:

The undersigned organizations are writing to ask for the Oregon Board of Forestry (Board) to continue its support for the completion of a Western Oregon State Forest Habitat Conservation Plan (HCP) without delay. The HCP Conservation Alternative 3 is a workable compromise that ensures compliance with the federal Endangered Species Act, and balances sustainable timber harvest with the protection of fish, wildlife, recreation, and clean water. It is also consistent with the Climate Change and Carbon Plan adopted by the Board that seeks to establish Oregon as a national leader in climate-smart forest policies. Now is the time to finalize the HCP and ensure that Oregon's state forests are managed for multiple values.

The latest attempt by some members of the timber industry to delay or derail the HCP and prioritize timber harvest over all other values should be rejected. Maximizing timber volumes on Oregon's state forests is inconsistent with the requirement to ensure the "Greatest Permanent Value" for all Oregonians. It is also clearly out of step with the values of Oregonians expressed in the recent survey conducted by the Oregon Values and Beliefs Center, which found that nearly 90% of respondents prioritize habitat for fish and wildlife, and safe drinking water over logging and economic development.

The HCP has been developed with years of extensive public input and countless hours of work by the staff of the Department of Forestry. The courts have affirmed the state's right to manage for multiple benefits on state forests (*Linn Co. v. State of Oregon*). Now is the time to maintain your responsibility to support the greatest permanent value of state forests for current and future generations and adopt a strong HCP without delay.

Finally, we encourage the Board to support legislation creating a task force to stabilize funding for local services in counties receiving state forest timber revenue by identifying alternative revenue sources that would fill gaps in ever-fluctuating timber revenues. We are hopeful that SB 90 is amended and passed to bring all sides to the table to create a plan that provides adequate funding to counties and taxing districts while protecting the resources Oregonians value on state forests.

Sincerely,

Brenna Bell
Forest Climate Manager
350PDX

Jason Wedemeyer
Executive Director
Association of Northwest Steelheader

Joseph Youren
Director
Audubon Society of Lincoln City and
Salem Audubon Society

Grace Brahler
Wildlands Director
Cascadia Wildlands

Chuck Willer
Co-Director
Coast Range Association

Bob Rees
Executive Director
NW Guides and Anglers Association

Casey Kulla
State Forest Policy Coordinator
Oregon Wild

Joe Liebezeit
Interim Statewide Conservation Director
Portland Audubon

Victoria Frankeny
Staff Attorney
Tualatin Riverkeepers

Michael Lang
Oregon Policy Senior Program Manager
Wild Salmon Center

From: oregon-gov-web-services@egov.com
To: [ODF DL Board of Forestry](#)
Subject: Habitat Conservation Plan
Date: Tuesday, February 21, 2023 1:07:44 PM
Attachments: [formsubmission.csv](#)

| | |
|---------|---|
| Name | Trygve Steen |
| Email | steent@igc.org |
| Subject | Habitat Conservation Plan |
| | <p>The following is a revised comment for the record in relation to the February 15, 2023 Board of Forestry Meeting. Hello, The following input is specific for the special meeting of the BOF held during the afternoon of February 15, 2023. I write to support the recent BOF vote to continue with the current planning process for an HCP that will facilitate future State Forest planning and operations. The present substantial HCA planning effort involving considerable staff time and public input process needs to be brought to completion. Restarting the process at the present time would represent significant losses as well as cause important delays for the development of a much needed plan. While some board members are concerned about recent cut estimates that have decreased the volume of timber available for logging, I think their concerns need to take into account the testimony by Mike Wilson presented during this meeting. To be sure I understood Mike's testimony, I have emailed him and have received his important confirmation of my notes taken during the meeting, as well as his providing additional information. In particular, I was concerned that the HCP was being viewed as the scapegoat for the reduced projected volume. I strongly feel that there are significant and justified reasons for the decreased volume estimates that are not fully due to the HCP. Here is what I wrote to Mike, "I thought I heard that the recent decrease in projected volumes of timber available for logging have come from technical adjustments to the yield modeling that are due to factors other than the HCP. I think that I heard that modeled available volume has been decreased due to the impacts of technical adjustments such as the impacts of Swiss Needle Cast (and other factors that I did not capture in my notes). (Steen)" Please note, Mike Wilson has been very clear with me "Since emails are public information, you may quote me where necessary. Needless to say, I am officially neutral on anyone's testimony. (Mike Wilson)" The following are the complete emails that I received in response from Mike Wilson: "The technical adjustments applied to the Implementation Plan modeling reflect district review of the outputs that indicate the overall volume per acre growth projections are optimistic. This is not specifically due to Swiss Needle Cast, although that is a significant factor on the Tillamook District. The general range of reduction from the base model outputs were 19% to 27%. As I stated in the meeting, these estimated reductions are based on cruise information for similar stands, so I believe our field staff did a good job in their estimates, but the FMP modeling will account for these issues and</p> |

Comments

present a much clearer picture of the long-term potential for the future under the HCP and FMP. There were additional growth considerations for Tillamook and also some model issues that are still being sorted out, so the decision was to keep Tillamook's harvest level at the current IP level of 47 mmbf, with the potential to be a little higher, dependent on having incidental take permits and being able to do the full suite of habitat enhancement activities in HCAs. Southwest District also had a model glitch, and so we held that in alignment with current IP ranges as well – of course, there is not much volume there under any circumstances, due to the small land base. While I don't want to portray the HCP as a scapegoat, the volume we are able to produce does ultimately come down to the available acres for production. I think we all need to see the FMP outcomes to really understand both the Board's decision space on harvest under the FMP with the HCP." In a subsequent email, Mike refined the above, "Actually, I have one correction on Southwest: The Southwest Unit model failed to work properly and ODF was unsuccessful at resolving the model performance issues in time for plan review. The previous IP had a volume range of 1.4 – 2.2 MMBF per year. The suggested volume range for this IP period was made using past management history, FY24 & FY25 AOP planning efforts and district knowledge. The bottom end of the range is zero due to challenges of working around T&E species in the unit. Flexibility is needed to work around T&E surveys and potential responses. Since emails are public information, you may quote me where necessary. Needless to say, I am officially neutral on anyone's testimony." I find the above information from Mike to be very helpful in understanding the reduced estimates of volume available for logging in the immediate future. Clearly there are significant and complex factors that have influenced the present estimates that have caused concern for some BOF members. However, at this point, I strongly feel that the present ESTIMATES do not support "throwing out the baby with the wash" and restarting the HCA process. Mike affirms my picking up on the impacts of Swiss Needle cast causing decreased available volume - - through its impact on the rate of tree growth. Mike also notes incidental take permit issues clouding the available volume on the Tillamook. Finally, he also notes that the Southwest unit model estimates were impacted by "the challenges of working around T&E species in the unit. Flexibility is needed to work around T&E surveys and potential responses." In the context of the above, I would also note that one benefit of an approved HCP would be reduced uncertainty from the impacts of T&E surveys in the future. Thanks for your attention to the above, Trygve Steen, Ph.D. Retired Professor of Environmental Science and Management. Portland State University

Submission ID: 9f2e918d-b67f-4066-907d-215cc003a526

Record ID:

From: [James Fraser](#)
To: [ODF DL Board of Forestry](#)
Cc: [Mark Rogers](#)
Subject: Written Testimony re Agenda Item 1 of 2/15 Board Agenda
Date: Monday, February 13, 2023 3:50:47 PM
Attachments: [image001.jpg](#)
[TU and OCTU Support for HCP - 20230213.pdf](#)

Dear Chair Kelly and Members of the Board of Forestry,

On behalf of Trout Unlimited and the Oregon Council of Trout Unlimited, please accept the attached testimony regarding agenda item 1 in the Board of Forestry's 2/15/23 meeting agenda.

Sincerely,

James Fraser



James Fraser / Oregon Policy Advisor

Trout Unlimited
<http://www.tu.org>



February 13, 2023

Oregon Board of Forestry

Re: Comments in support of HCP (for February 15, 2023 Special Meeting)

Dear Chair Kelly and Members of the Board of Forestry,

Trout Unlimited (“TU”) is a non-profit organization dedicated to the conservation of cold-water fish (such as trout, salmon, and steelhead) and their habitats. The organization has more than 350,000 members and supporters nationwide. The Oregon members of TU are affiliated with the Oregon Council of Trout Unlimited (“OCTU”).

TU and OCTU are committed to caring for Oregon rivers and streams – including those on Oregon Department of Forestry (“ODF”) lands – so future generations can experience the joy of wild and native trout and salmon.

Our organizations have a long history of working on salmonid conservation initiatives, including advocacy on forestry policy and restoring anadromous fish passage to ODF property. Recently, this work has included engaging in the public process on the Western Oregon State Forests Habitat Conservation Plan (“HCP”).

TU and OCTU encourage the Board to maintain the current path and timeline on the HCP.

The HCP process has been comprehensive, transparent, and effective. If the Board pursues modifications to the HCP at this stage, it will likely delay implementation of related measures, and potentially affect the ability for Oregon to obtain an incidental take permit for relevant forestry activities. Our organizations do not support conducting additional analyses or modifications outside the bounds of the HCP currently under consideration.

Thank you for this opportunity to provide comments on the HCP, and please let us know if you have any questions.

Sincerely,

James Fraser
Oregon Policy Advisor
Trout Unlimited

[REDACTED]

Mark Rogers
Chair
Oregon Council of Trout Unlimited

[REDACTED]

From: [Victoria Frankeny](#)
To: BoardofForestry@oregon.gov
Subject: TRK Comment on Proposed Vote to Delay HCP
Date: Monday, February 13, 2023 1:23:42 PM
Attachments: [TRK Comment on Proposed HCP Delay.pdf](#)

Good afternoon,

Please see attached written comment in response to the Board of Forestry special meeting scheduled for February 15 regarding possible HCP delay. I am more than happy to answer any questions regarding these comments.

Best,

Victoria Frankeny [she/her]
Riverkeeper & Staff Attorney
Tualatin Riverkeepers | tualatinriverkeepers.org
[REDACTED] (mobile)
[REDACTED] Tualatin, OR [REDACTED]



11675 SW Hazelbrook Road | Tualatin, OR | 97062 | (503) 218 2580 | tualatinriverkeepers.org | info@tualatinriverkeepers.org

February 13, 2023

Oregon Board of Forestry
2600 State Street
Salem, Oregon 97310

Submitted via email

Re: Public Comment on Proposed Vote to Delay the Western Oregon State Forest Habitat Conservation Plan

Dear Chair Kelly and Members of the Board of Forestry:

Tualatin Riverkeepers (TRK) is a community-based organization that protects and restores the Tualatin River watershed. We build watershed stewardship through engagement, advocacy, restoration, access, and education. Our watershed begins in the Tillamook State Forest and has many uses, including recreation, critical fish habitat, and drinking water for over half a million people.

TRK writes to encourage the Board to proceed, without further delay, in adopting the Habitat Conservation Plan for Western Oregon State Forests. ODF staff has been working tirelessly to move forward with the HCP and have it adopted simultaneously with the Forest Management Plan. A delay would derail this timeline, and may require additional short-term Implementation Plans in the near future.¹ Furthermore, a delay could compromise ODF's collaboration with Fish & Wildlife Service and National Marine Fisheries Service (the Services). The HCP is needed to

¹ District IPs are currently out for public comment. These IPs are set up for a two-year expiration period to allow for long-term IPs that incorporate a newly-adopted HCP and FMP. A delay would disrupt this carefully thought-out adoption process and would require additional short-term IPs to fill in the gap. This would require additional staff and resources that were not originally accounted for.

acquire an Incidental Take Permit. Any delay prolongs ODF's ability to obtain an ITP, and any weakening of the HCP puts ODF at risk for noncompliance with the Endangered Species Act.²

The Board should vote no on to delay the HCP further for the reasons mentioned above. Additionally, we encourage the Board to consider stronger conservation measures that would provide greater ecological and health benefits for our state forests. In doing so, this would not prolong HCP adoption, nor the issuance of an ITP, and would put economic benefit of fish and wildlife habitat, recreation, and drinking water in the forefront, thereby providing the greatest permanent value for all Oregonians.

Please feel free to contact me if you have any questions regarding this comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Victoria Frankeny". The signature is fluid and cursive, with a large loop at the end.

Victoria Frankeny [she/her]
Riverkeeper & Staff Attorney
Tualatin Riverkeepers
[REDACTED]

² ESA prohibits the “take” of any endangered or threatened species without an ITP. 16 U.S.C. §§ 1538(a), 1539(a)(1)(B). However, an ITP *cannot* be issued without an accompanying HCP. *Id.* § 1539(a)(2). The Services can only issue an ITP if they find the HCP has met certain requirements set forth by the ESA. *See id.* § 1539(a)(2)(B).