



The League of Women Voters of Oregon is a 100-year-old grassroots nonpartisan political organization that encourages informed and active participation in government. We envision informed Oregonians participating in a fully accessible, responsive, and transparent government to achieve the common good. LWVOR Legislative Action is based on advocacy positions formed through studies and member consensus. The League never supports or opposes any candidate or political party.

October 2, 2020

To: Board of Forestry
Tom Imeson, Chair
1621 NE Broadway #224
Portland, OR 97232

Email: BoardofForestry@oregon.gov

Re: Habitat Conservation Plan – **Support**

The League of Women Voters of the United States believes that natural resources should be managed as interrelated parts of life-supporting ecosystems. Resources should be conserved and protected to assure their future availability. Pollution of these resources should be controlled in order to preserve the physical, chemical and biological integrity of ecosystems and to protect public health.

In addition, the LWV of Oregon supports the Land Conservation and Development's land use goals that promote the management of forest lands for both economic development and their value as natural resources. The state should have the prime responsibility for establishing statewide planning goals and for supervising and coordinating comprehensive land use plans, with participation by the public and by local and regional governments.

The Habitat Conservation Plan (HCP) appears to present a balanced approach to satisfying the federal requirement for protecting endangered species while permitting timber harvests on ODF-managed lands in equal measure. The Plan represents a compromise comparable to HCPs in other states that should satisfy both timber industry interests and those of the fish and wildlife conservation communities. For this reason, the LWVOR supports the HCP and recommends that the Board pass the HCP on to the National Environmental Policy Act (NEPA) review process, with the caveat that the details of the plan get further refinement from a balanced advisory group composed of all stakeholder groups.

The reasons we support the plan are as follows:

For the timber industry, it provides:

- Clear maps delineating what areas can be logged in the future that will allow for better planning of future operations and revenue expectations for 70 years,
- A degree of legal assurance for the timber industry that they are less likely to be subjected to future costly lawsuits for accidental takes.
- An ample number of acres of land that is available for harvest (about half the land) without concern about shrinking permit areas in the future.
- Financial stability for counties dependent on timber revenues with better volume and revenues than the current or draft Western Forest Management Plans (FMPs).
- The comparative analysis points to more land permitted for future timber harvests going forward in the Habitat Conservation Areas (HCAs) than with the take-avoidance schemes in the two FMP plans.
- Streamlined timber sale process to improve time to market and capture high market prices.

For Oregonians concerned with the conservation of wildlife and high-quality drinking water sources:

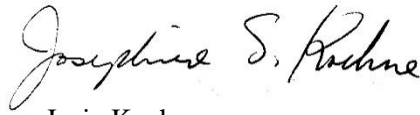
- HCAs preserve more contiguous areas (fewer patch areas) for the habitat protection for endangered species as required by federal law.
- Assures protection for streams, with wider buffers to keep streams silt-free and cool enough for fish, including the non-bearing streams that feed into them.
- Elimination of costly species surveys prior to timber sales and forest operations, which should free up ODF resources for monitoring and other adaptive management projects.
- More assured funding for ODF management through more consistent harvest volume and revenue.

The plan will no doubt be refined, and there will be time for additional public input to make improvements, but we urge the Board of Forestry to allow the HCP to continue on to the NEPA process along with a companion FMP. The plan lives up to ODF's obligation to manage for Greatest Permanent Value for now and in the future.

We appreciate the opportunity to submit our comments and hope they will be helpful.



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