



January 2, 2024

Oregon Board of Forestry
2600 State Street
Salem, Oregon 97310

RE: Support the State Forest Habitat Conservation Plan

Dear Chair Kelly and Members of the Board of Forestry:

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

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

Recent modeling report, climate change and habitat estimates

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

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

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

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

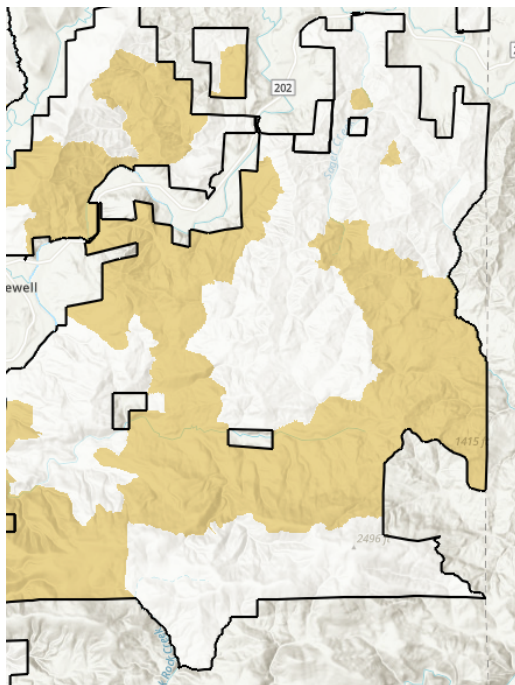
The Forest Service uses a climate extension to the Forest Vegetation Simulator as a tool for considering the effects of climate change on forest ecosystems. These and other similar tools are available to the ODF and should be applied in the future.

HCA boundaries and mature forests

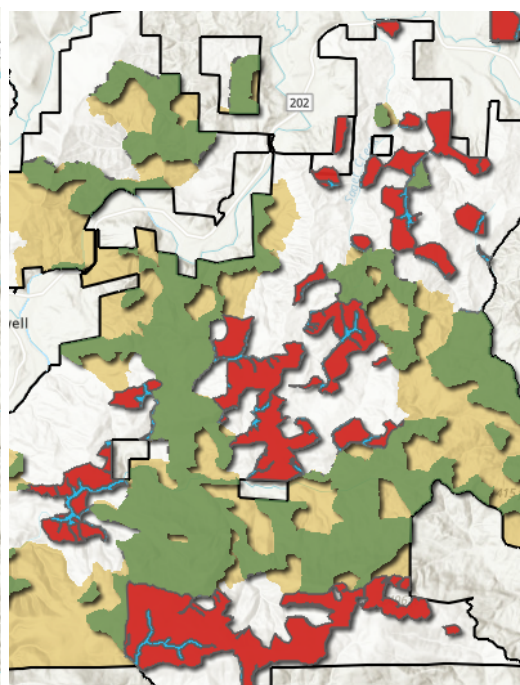
Our groups have analyzed the age classes of forest stands in western Oregon state forests and the amount of stands 80 years old and older that are included within the HCAs and RCAs. We determined that 30% of stands 80 years old and older are excluded from HCAs and RCAs. Many of these older stands are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

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

Map A.



Map B.



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

RCA stream buffers are inconsistent with the best science available

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

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

Protect Cook Creek from clearcut logging and road building.

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

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

Sincerely,

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