To: Board of Forestry

Submitted via email: boardofforestry@oregon.gov

From: Forest Defense Team, 350PDX.org

5 September 2022 *Draft 3 by Darlene Chirman, Brenna Bell, Grace Brahler 8/29/2022*

**RE: Comments for 7 September 2022 BOF Meeting, re Habitat Conservation Plan for the Western Oregon State Forests (Agenda Item #8)**

Dear Chair Kelly and Members of the Board of Forestry,

Thank you for the opportunity to comment on the draft Habitat Conservation Plan for the Western Oregon State Forests (HCP), which is an information item at the 7 September Board of Forestry meeting. We support your continued work that will lead to adoption and implementation of a robust HCP.

Oregon forests provide some of the most significant opportunities for reducing atmospheric carbon through sequestration and storage. Actions such as setting aside carbon reserves of older forests (largely encompassed by the Conservation Areas), establishing longer rotations in the production stands, and retention of large, older trees in production stands would all enhance carbon storage and sequestration with the co-benefit of protecting sensitive species’ habitat. **The BOF can and should use its authority to choose an HCP that will ensure protections for both the forests and the life that depends on them for the next 50 to 70 years.**

In light of that, we urge the Board of Forestry (BOF) to support Alternative 3, the Conservation Alternative, with a few improvements. The Conservation Alternative is the most likely to aid in recovery of the covered species while also providing more certainty for the Oregon Department of Forestry to guide both responsible management and more sustainable logging in state forests.

We recommend that the Conservation Areas, both Habitat Conservation Areas (HCAs) and Riparian Conservation Areas (RCAs) be co-managed for the protection and recovery of threatened and endangered species and as carbon reserves. This will allow ODF to implement the Climate Change and Forest Carbon Plan (CCCP), adopted by this Board in November 2021, with the least impact to production areas of the state forests. The Conservation Areas can be managed to provide multiple benefits: threatened and endangered species protection and recovery; protection of drinking water quantity and quality by increasing summer streamflow; carbon storage and sequestration; and increased biodiversity of flora and fauna.

The broad range of undersigned climate, conservation, fishing, and other interest groups urge the BOF to request enhanced conservation practices in the Conservation Areas beyond those currently proposed in Alternative 3. For example, we propose prohibition of:1) hardwood tree harvest iin the HCAs (proposed 15,000 acres); 2) clearcut harvest or thinning solely for the promotion of harvest value within HCAs; 3) post-fire logging in HCAs, with limited exception for safety near public use areas such as trailheads. Furthermore, timber harvest within the HCAs should be limited to plantations to promote mature forest structure. Removal of felled trees should be allowed only along existing roads, whereas felled trees distant from existing roads should be retained. We also support the improved steep slope logging protections and attention to excessive road network impacts outlined in Alternative 3, which would provide a wide array of benefits to aquatic habitat and species. The BOF can make changes to the draft HCP *that are more protective of natural resources,* without additional environmental analyses.

In addition, natural forest regeneration should be required following natural disturbances within Conservation Areas—such as fire, insect infestations, or windfall. Studies have shown that post-disturbance harvests delay the recovery of mature forest structure, upon which the covered terrestrial species depend. Interplanting with diverse tree and understory species should be reserved only for areas where the possibility of natural regeneration is limited.

Finally, the draft environmental impact statement evaluated permit terms of 50 and 70 years. Given the uncertainties of increased climate change impacts to the Western Oregon state forests (and elsewhere), we urge you to adopt a permit term of 50 years, as it both ensures some future certainty while also recognizing the climate that may change more rapidly than we are expecting. A slightly shorter term would better serve both Oregnians and the species covered in this HCP.

In summary, we strongly urge the Board of Forestry to move forward with the Habitat Conservation Plan Alternative 3, with modifications that better protect the Conservation Areas, and co-manage the HCAs and RCAs as carbon reserves for a 50-year permit term.

Sincerely,

* groups from the state forests coordination group or beyond

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