

LINN COUNTY BOARD OF COMMISSIONERS



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DARRIN L. LANE
Administrative Officer

April 11, 2023

Dear Board of Forestry Members: Jim Kelly, Chair
Liz Agpaoa
Karla Chambers
Ben Deumling
Chandra Ferrari
Joe Justice
Brenda McComb

Linn County is very concerned with the path the Board of Forestry (BOF) is on and with the continued refusal from the Oregon Department of Forestry (ODF) to engage with the counties creating a Habitat Conservation Plan (HCP). The Linn County Board of Commissioners are elected to represent approximately 130,000 citizens; many of whom are employed in the forest products industry.

The Oregon Department of Forestry's Habitat Conservation Plan (HCP) will significantly reduce the volume of timber harvested on State lands which will result in a reduction in jobs and timber harvest revenue in our community. As Linn County turned these lands over to the BOF and ODF for management for our benefit, we count on the revenue from these lands and we expected to be involved and asked to support the HCP before it can move forward.

With more than 50 percent of Linn County land forestland, a reduction in timber harvest revenue and jobs will have a significant negative impact on our communities. Wood products manufacturing in Linn County generates millions of dollars in direct and indirect economic activity. If implemented, this Habitat Conservation Plan will reduce log supply which jeopardizes entire communities and not just those who work directly in the forest sector. The cost associated with public services, education, housing, etc. will, most likely, increase during the 70-year HCP permit period. Reducing revenue that supports these services will greatly impact our life and ability to deliver services.

In the work done by ODF, inaccurate numbers were used to project loss of jobs in the Environmental Impact Statement. The Environmental Impact Statement's modeling shows three jobs per million board feet of timber harvested. The Forest Products Industry standard uses 11-12 jobs per million board feet of timber harvested. ODF's Environmental Impact Statement only accounts for one-quarter of the jobs in the Forest Product Industry. The crude discrepancy underestimates and undervalues the impact of the loss of jobs, as well as, the impact on local communities and the disruption of families.

We believe the BOF and ODF will be in direct conflict of their obligation to the counties to manage forests for the 'greatest permanent value'. As the BOF and ODF are knowingly allowing this HCP to move forward using ODF's Forest Management Plan which has been proven in a court of law to be a failure. The court award \$1.1 billion to the counties suing the State and Board of Forestry for mismanagement of State timberlands while using the same Forest Management Plan as the HCP.

The BOF's decision to allow the HCP to move into the National Environmental Policy Act (NEPA) process without obtaining input and approval from the Council of Forest Trust Land Counties is appalling and needs to be addressed before moving forward. As projected in the Environmental Impact Statement for the HCP, harvest revenues will not cover ODF's costs associated with this HCP. Taxpayers will be burdened with the expense of this plan; many of whom will also be looking for work.

It is deeply concerning that the BOF and ODF would pursue a plan that would lead to its own insolvency and hinder its mission and contractual obligations. The current HCP, if implemented, would amount to gross financial mismanagement.

We find it alarming that wildfire is defined as a 'disturbance' in the Environmental Impact Statement. Wildfire, as a 'disturbance', is known to be most severe in passively managed forests. Fuel loads in passively-managed forests are greater than in actively managed forests, therefore, forest fire poses a significant concern to areas surrounded by passively managed forests. Forest fires also impact other industries our community relies on for revenue and the health of our residents. We've watched forest fires devastate rural communities around our State. Linn County is surrounded by forests and we do not want to add more fuel to any possible fires.

Wildfires consume forests, kill wildlife, pollute our air and damage waterways. The very animals the HCP is trying to protect are in greater danger in passively managed forest than a healthy actively managed forest. This HCP will decimate Oregon's ability to make climate-friendly wood products; the only building material that actually stores carbon. The HCP pushes the need for wood products on other countries ignoring available counties timber which creates a much bigger worldwide impact on the global environment with lesser developed countries, with inadequate environmental practices, filling the gap in the need for timber products.

The HCP will impact our ability to make advanced wood products like CLT for building. Wood is the only renewable and sustainable building material. The cement industry contributes five percent of the world's emissions and the steel industry contributes eight percent, whereas, the Forest Products Industry uses wood which sequesters carbon and locks it up unless it burns. The drastic decrease of available timber will require us to import more of our wood products from other places that don't share our commitment to sustainability and will enlarge our carbon footprint. From a global perspective, we will do dramatic damage worldwide.

Since the 1990's, we've witnessed 90 percent of Federal timberland and hundreds of thousands of acres of State and Private timberland not being managed properly, in part, due to the Endangered Species Act being used to protect habitat. We are now witnessing the unintended consequences; increase of severe wildfires, longer fire seasons, loss of wildlife, loss of habitat, polluting our air and destroying watersheds all at an accelerating financial and environmental expense.

Studies show that the Northern Spotted Owl's population is steadily declining despite other HCP's dedicated to protecting and improving its habitat. After decades of our forests being set aside to protect the habitat of the Northern Spotted Owl, we now know the greatest threat to the Northern Spotted Owl is the Barred Owl and not the lack of habitat. The current HCP does not address the threat of the Barred Owl on the Northern Spotted Owl nor does it estimate future population targets of the subject species. Our concern is that the Northern Spotted Owl and other species could be used to perpetuate Habitat Conservation Areas when the other issues are not being addressed.

Letter to the Board of Forestry
April 11, 2023
Page Three

The benefits derived from the Habitat Conservation Plan, many of which are in dispute, do not justify the socioeconomic impact, environmental impacts, obligation of the State to manage forests for the greatest permanent value and loss of harvest revenue we depend on. The Linn County Board of Commissioners oppose the current proposed Western Habitat Conservation Plan which will have drastic direct and indirect impacts on residents, our community and our environment for over 70 years.

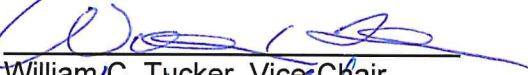
Please slow down and reject the current proposal.

Sincerely,


LINN COUNTY BOARD OF COMMISSIONERS



Roger Nyquist, Chair



William C. Tucker, Vice-Chair



Sherrie Sprenger, Commissioner

c: Cal Mukumoto, Department of Forestry
David Yamamoto, Chair, CFTLC