



# 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](http://www.co.clatsop.or.us)

May 26, 2023

Cal Mukumoto  
State Forester  
2600 State Street  
Salem, OR 97310

Dear Mr. Mukumoto,

The Department of Forestry is coordinating policy development, regulatory updates, and ESA compliance simultaneously in both the State Forests and the Forest Resources Divisions; thus, the Private Forest Accord (PFA) development is concurrent with State Forests Habitat Conservation Plan (HCP) development.

It is our Board's understanding that the Department of Forestry is attempting to obtain a stewardship agreement with the Forest Resources Division to gain alignment with current and near future PFA requirements. Based on this understanding, the Clatsop County Board of Commissioners makes a formal request to include all Board of Forestry lands listed in the State Forests HCP in the PFA HCP permit area. Rather than obtain a stewardship agreement that provides legal sufficiency with PFA without Federal ESA coverage for Coho; it is our understanding that there is still time to include Department of Forestry lands within Clatsop County in the permit area of the proposed HCP.

The Board of Commissioner request is based on the following:

- Ensures policy consistency, standards, and legal sufficiency in forest management on Department of Forestry lands with Forest Practices Act;
- Provides contingency ESA coverage of Coho, should the State forests HCP not be adopted or delayed;
- Current State Forest HCP has demonstrable needs for improvement, and this allows ESA protection during the interim as the tool matures;
- It is aligned with litigation settlement agreements;
- A delay in this decision could be very difficult to rectify once the NEPA process begins.

To summarize, Clatsop County requests all Department of Forestry lands listed in the State Forests HCP be included in the PFA HCP permit area.

Thank you for your consideration.

Sincerely,

Mark Kujala, Chair  
Clatsop County Board of Commissioners

C: Josh Bernard, Forest Resources Division Chief  
Mike Wilson, State Forests Division Chief  
Geoff Huntington, Governor's Office  
Board of Forestry Members  
Jim Kelly, Chair  
Liz Agpaoa  
Karla Chambers  
Ben Deumling  
Chandra Ferrari  
Joe Justice  
Brenda McComb