



# Clatsop County

## Board of Commissioners

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March 4, 2024

To: Cal Mukumoto, State Forester, Oregon Department of Forestry  
Oregon Board of Forestry Members  
Federal Services Representatives

From: Clatsop County Board of Commissioners

Subject: *DRAFT WESTERN OREGON STATE FOREST HABITAT CONSERVATION PLAN  
(HCP) – COUNTY REQUEST FOR NEW EIS AND PUBLIC COMMENT PROCESS*

The Clatsop County Board of Commissioners has been unanimous in support of an HCP for the western Oregon state forests; and has repeatedly requested the Department of Forestry actively engage with local public officials and District forestry staff to develop a balanced, equitable, fair, and legally defensible HCP that serves environmental, economic and social interests.

It is our understanding, based on publicly available information, that substantive changes have been made to the underlying data and assumptions used to formulate the current draft HCP. Based on publicly available information, we are of the opinion the modifications (in-total) are substantive enough to warrant another draft EIS and public comment process.

Although not a complete representation, the following highlights some of the changes that have occurred since the original release of the draft HCP:

- *The Red Tree Vole has been determined to not warrant additional protections as a covered species.* This impacts the no action alternative, where it was assumed that starting in 2023, there would be a significant rise in covered species primarily as a result of the Spotted Owl and Red Tree Vole. This has already proven to not be the case and instead of additional acres being encumbered by threatened and endangered species there are actually opportunities to free up already encumbered acres having the reverse affect of the assumptions made in the no action alternative.
- *New models have been subsequently established, with new outputs.* The new models have effectively changed the volume for harvest across all the alternatives. The lower volume estimates increase the social and economic impacts – beyond what was captured in the original draft HCP.
  - The downward volume adjustments were not equally applied across all alternatives, as the various alternatives had harvest occurring at different ages and the age of harvest was one of the changes to the model. This impacts how the harvest units

were chosen; thus, changing the environmental impacts within individual watersheds and across the Districts.

- Assumptions listed with modeling results make it clear that key pieces of information that will dramatically change the numbers are still outstanding. Of most importance among them being a change in available acres within the non-HCA areas. This will increase the social impact to these areas specific to alternatives with HCAs.
- New models show that the 70-year commitment to existing habitat has already been met. This information should have informed options whereby habitat acreage could be removed from the models and the economic impacts on ODF and local taxing jurisdictions minimized.
- ODF is struggling to achieve the lower volumes within the new model outputs. Model outputs depend on extensive harvests within the HCAs for the first thirty (30) years. Planned harvest to date do not show this increased harvest within the HCAs. Assurances in public meetings have been made that “sometime” in the next few years harvests will dramatically increase, but no evidence of this has been shown to date.
- ODF is on the record stating the geo-region model that was used for the original model is not viable.
- New Stream data from the Private Forest Accord indicates the underlying data used for the HCP is no longer accurate, nor represents the best available science. This data could alter the stream buffers, which impacts the overall landscape dedicated to conservation vs. production.
- Oregon Department of Forestry is on record stating the HCP will impact the solvency of the state agency. Alternative funding sources, approved by the legislature, will be required to pay for general operating expenses (formerly paid by timber revenue).
  - This changes how ODF funding is described in Chapter 9.
  - This also impacts the analysis of social impact, due to the opportunity cost of a State General Fund bailout. Dedication of state discretionary revenues (General Fund) will reduce revenues available for other priority services and service levels (i.e. housing, homelessness, addiction treatment, public safety, etc.).
  - Chapter 9 currently states ODF is primarily funded by timber sales. It further describes that to fully implement the HCP will only take around seven (7) full time staff. However, this ignores all of the staff that is laying out, administering, and replanting timber sales. The seven staff cannot be paid without these other staff members doing their job. These staff members are all specialists and not field personnel. The work on the HCP will be performed in the field and not in the office. Therefore, it will require more than the noted staff compliment.
  - Without showing the funding for the HCP, the Department of Forestry is not meeting a key requirement of all HCPs.
- ODF is pursuing an HCP through the Forest Resource Unit that will cover Coho. This HCP may be completed prior to the Northwest Oregon State Forest Plan and will likely have significantly lower cost.
- ODF should have a new inventory that will change the numbers related to volume and habitat across the entire plan area (is overdue for completion). The HCP should be informed by the most recent data available.
- Multiple additional changes have been insinuated in public meetings since the release of the last public draft.

- Additional issues that are not covered by the modeling scenarios that are greatly weighted towards the Non-HCA areas of the landscape.
  - Property line issues
  - Scenic Highways
  - In-operable areas (access restricted)

The entire HCP process is intended to thoughtfully consider a range of costs/benefits and balance environmental, economic and social concerns. As the underlying data and assumptions have been substantially modified, the Clatsop County Board of Commissioners respectfully requests a new EIS and public comment process. The Board of Commissioners are committed to an HCP, but are unwavering in our commitment to a plan that is balanced, equitable, fair and legally defensible.

Please consider our request for a new EIS and public comment process.

Respectfully,



Mark Kujala, Chair  
Clatsop County Board of Commissioners