



*The League of Women Voters of Oregon, established in 1920, is a grassroots nonpartisan political organization that encourages informed and active participation in government. We envision informed Oregonians participating in a fully accessible, responsive, and transparent government to achieve the common good. LWVOR Legislative Action is based on advocacy positions formed through studies and member consensus. The League never supports or opposes any candidate or political party.*

January 11, 2024

**To: [Oregon Board of Forestry](#)  
Jim Kelly, Chair  
Members of the Board**

**Re: January 3<sup>rd</sup> Agenda Item 2, Public Comments–Habitat Conservation Plan–Support**

**The League of Women Voters of Oregon (LWVOR) Supports Alternatives 2 & 3 of the Western Oregon State Forests Habitat Conservation Plan.**

LWVOR supports Oregon’s statewide land use planning program. Specifically, we support Goal 4 that promotes the management of forest lands for both economic development and their value as natural resources. We believe that the state should have the primary responsibility for establishing statewide planning goals and for supervising and coordinating comprehensive land use plans, with participation by the public, implemented by local and regional governments. Full accounting of all costs, including cumulative ecological impacts, of timber harvests and other forest uses must be considered in forest activity decisions.

In addition, LWVOR believes that water is a resource that should be managed for the benefit of the public and as sustainable habitat for all life forms. The League supports Oregon state policies and statutes that promote comprehensive long-range planning for conservation and management of ground and surface water and the improvement of water quality.

We support the second and third alternatives of [The Western Oregon State Forests Habitat Conservation Plan \(HCP\)](#) which we think best represent the intent of the negotiations and the purpose of an HCP in protecting endangered species as required by federal law.

The Habitat Conservation Plan (HCP) presents a balanced approach to satisfying the federal requirement for protecting endangered species while permitting timber harvests on the 640,000 acres of ODF-managed lands. The reasons we support the plan are:

**For the timber industry, it provides:**

- Clear maps delineating what areas can be logged in the future. That will allow for better planning of future operations and revenue expectations for 70 years.
- A degree of legal assurance for the timber industry that they will be less likely to be subjected to future costly lawsuits for accidental takes.
- An ample number of acres of land that is available for harvest (about half the land) without concern about shrinking permit areas or additional endangered species in the future.
- Financial stability for counties dependent on timber revenues (and we support a separate conversation on county finance).
- The comparative analysis points to more land permitted for future timber harvests going forward in the Habitat Conservation Areas (HCAs) than the current plan.

- Streamlined timber sale process to improve time to market and capture high market prices.
- New tax credit provisions and an agency office responsive to small forest owners to partially compensate them for timber sale losses due to new stream buffer requirements of the Private Forest Accord.

**For Oregonians concerned with the conservation of wildlife and high-quality drinking water sources, it provides:**

HCAAs preserve more contiguous areas (fewer patch areas) for the habitat protection for endangered species as required by federal law:

- Assures protection for streams, with wider buffers to keep streams silt-free and cool enough for fish, including the non-bearing streams that feed into them
- Elimination of costly land surveys prior to timber sales and forest operations, which should free up ODF resources for monitoring and other adaptive management projects
- More assured funding for ODF management through more consistent harvest volume and revenue
- Additional carbon sequestration to mitigate CO2 emissions as a bonus
- Helps with cleaner drinking water resources, improved soils and reduces algae blooms

The plan lives up to ODF's obligation to manage our State Forests for the Greatest Permanent Value for all Oregonians both today and in the future. The EIS report provides tables comparing the plan alternatives, and we conclude that Alternatives 2 and 3 will provide the best outcomes and overall benefits to most Oregonians as we face future climate conditions.

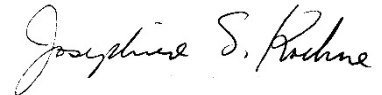
We appreciate the opportunity to submit our comments and hope they will be helpful.



Rebecca Gladstone  
LWVOR President



Peggy Lynch  
LWVOR Natural Resources Coordinator



Josie Koehne  
Forestry Portfolio

Cc: [Oregon Climate Action Commission](#), [Oregon Dept. of Energy](#)