



Clatsop County

Board of Commissioners

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August 23, 2023

Dear Board of Forestry Members: Jim Kelly, Chair

Liz Agpaoa

Karla Chambers

Ben Deumling

Chandra Ferrari

Joe Justice

Brenda McComb

The Clatsop County Board of Commissioners supports the development of a Western Oregon State Forest Habitat Conservation Plan (HCP). Throughout the Board of Forestry and Oregon Department of Forestry plan development process, our challenge and goal has been to raise awareness for the need of a balanced plan that faithfully accounts for environmental, economic, and social factors.

The current draft disproportionately impacts Clatsop County, including our economy, local taxing jurisdictions (services and service levels), and our social/civic institutions. It does not reflect the balance we have been seeking throughout the development process.

We remain concerned about the disproportionate local impacts in the following areas:

- **Reduction in family wage jobs** supporting all corners of our rural community;
- **Significant reductions in local government revenues**, including Clatsop County, cities, school districts, health care districts, community college, rural fire districts, transportation district, and other special districts;
- **Reduction in service levels for vital services**, including law enforcement and public works (roads);
- **Long-term impacts on the civic underpinnings (foundation) of our community**, including: philanthropy, healthcare, education, not-for profits, and civic organizations.

For these reasons, while we collectively support an HCP, we implore the Board of Forestry to adjust the draft plan by adding production acres within the Clatsop State Forest to partially mitigate the significant and disproportionate impacts on our community.

CLATSOP COUNTY REQUEST

Clatsop County respectfully requests the Board of Forestry modify the draft HCP by adding 10,000 production acres in the Clatsop State Forest to partially mitigate the disproportionately severe economic and social impacts on our community.

While the HCP is in the NEPA process, the Board of Forestry has the opportunity to change Habitat Conservation Area boundaries without altering the habitat commitments across the plan area. This alone would create greater proportionality, thus decreasing the outsized impacts to Clatsop County, while adhering to the habitat commitments the Oregon Department of Forestry has made to Federal Services in the draft EIS.

Clatsop State Forest has the least amount of existing Threatened and Endangered Species, when compared to other state forest districts. The draft HCP, however, designates disproportionate acres for Habitat Conservation Areas within the Clatsop State Forest. While we are fully committed to protections for species of concern, including the Coho and Marbled Murrelet, we strongly encourage a more balanced, equitable, and sustainable approach.

The requested addition of 10,000 production acres within the Clatsop State Forest will provide additional certainty in terms of local jobs and government services, and maintain a strong commitment to the overall environment, wildlife, riparian areas, and water quality.

We are confident that our request is both reasonable and feasible and could be obtained in any number of manners, including:

- 1) Doubling up where riparian conservation zones are adjacent to Habitat Conservation Areas;
- 2) Capitalizing on areas where logging is difficult due to geotechnical concerns, public safety areas, and areas nearby drinking water.

Production acres could also be obtained by looking to stands on the edges of the Habitat Conservation Areas that are not projected to become habitat until well into the permit term. These generally would be stands that now are less than 50 years old.

SUMMARY

Clatsop County values our partnership with the State, and will continue being a strong and vocal advocate for a balanced HCP that faithfully and equitably considers environmental, economic, and social factors.

The County's request for an additional 10,000 production acres is made within the framework of the draft HCP and demonstrates our commitment to the HCP process, environment, economy, and the health, safety, and well-being of our community over the long-term.

While the state forests are a statewide asset and resource – do not forget about those that live and work in our rural community. The quality of our life, our businesses, our public institutions, and our civic landscape matter and require the State’s consideration.

We respectfully make this feasible request as a means to move the HCP forward, without leaving the Clatsop County community behind.

Thank you for your consideration.

Sincerely,



Mark Kujala, Chair

C: Governor Kotek
Cal Mukumoto, Department of Forestry
David Yamamoto, Chair, CFTLC