



# Clatsop County

## Board of Commissioners

800 Exchange St., Suite 410  
Astoria, OR 97103  
(503) 325-1000 phone / (503) 325-8325 fax  
[www.ClatsopCounty.gov](http://www.ClatsopCounty.gov)

January 3, 2024

Oregon Board of Forestry  
2600 State Street  
Salem, OR 97310

Dear Board of Forestry,

Clatsop County deserves a Western Oregon State Forest Habitat Conservation Plan that, 1) protects the financial wherewithal of local taxing jurisdictions and the essential services they provide; 2) protects the services and service levels directed to the most vulnerable in our community; 3) protects Greatest Permanent Value as the cornerstone principle between the State and Trust Counties; and 4) complies with the issuance criteria for incidental take permits defined by the federal services.

For Clatsop County, this is a matter of equitable public policy. If the proposed habitat conservation plan is approved, it is clear from every analysis that Clatsop County residents will pay either through higher taxes or reduced services and service levels. The median income in Clatsop County trails the Oregon average by more than 10%, and we are home to the highest per capita homeless population in the State. It is not fair or equitable, to impact our community with the inevitability of reduced services, service levels and a slow decline of quality of life and overall community safety and stability. The projected loss of family wage jobs in our county due to reduced harvest will only further erode our economic base and weaken the fabric of our community.

Analysis by ODF makes it clear, the habitat generated in conservation areas for the HCP, far exceeds the number required to meet ODF's habitat commitments. As a result, the HCP unduly impacts local taxing jurisdictions, rural employment, and ultimately essential community services. Even after repeated presentations, ODF staff has not adequately explained why the scale of the draft HCP is appropriate, given ODF's legal mandate to manage for Greatest Permanent Value, or why acreage in conservation areas should far exceed the habitat commitments. We have heard from ODF about the need to account for uncertainty and the "stay ahead" provisions. We understand these are concerns; however, we do not understand how ODF arrived at this version of the HCP. From our perspective, conservation areas could be smaller, and the plan made more equitable, and still meet the federal issuance criteria.

Clatsop County respectfully requests the Board of Forestry direct ODF to reduce the impacts on Clatsop County and the other forest trust land counties while the opportunity still exists (before

the HCP is approved), and while ODF manages under the Coho lawsuit settlement agreement, valid through 2028.

As the draft HCP has been developed, Clatsop County has consistently seen the negative impacts on or community grow and worsen over time. We want to collaborate and partner with you on changes to the draft HCP that protects the environment (garners federal services approval) and reduces/mitigates impacts on our rural community.

Sincerely,



Mark Kujala, Chair  
Clatsop County Board of Commissioners