



COMMISSIONER DAVID LOVEALL, District 2, Springfield

Lane County Commissioner
Springfield District
David.Loveall@lanecountyor.gov

March 2, 2023

In the matter of opposing ODF's Current Western Habitat Conservation Plan:

WHEREAS, The Lane County Board of Commissioners represents an estimated 383,000 citizens, many of whom are employed in the forest products industry.

WHEREAS, Lane County includes 2,915,000 acres, of which 85% are forest land, and 58% are public forest land. The forest sector is important to Lane County's economy today and in the future. It is especially critical for the prosperity of rural Lane County.

WHEREAS, Oregon Department of Forestry's Habitat Conservation Plan will significantly reduce the volume of timber harvested on state lands which will result in a reduction in jobs and timber harvest revenue in our community and starve out our rural communities already struggling.

WHEREAS, Over \$5.5 million timber harvest revenue was distributed from Board of Forestry Lands (BOFL) in 2020. Lane County distributes 10 percent of the BOFL payments to the County General Fund, 25 percent of the balance to the County School Fund, and the remainder to the taxing districts where the timber harvests occur. A reduction in timber harvest revenue and jobs will have significantly and continued negative impacts on our community.

WHEREAS, 97.8% of timber harvested in Lane County is also milled in Lane County. Sawmills in Lane County generate hundreds of millions of dollars in direct and indirect economic activity. These mills will be directly and indirectly impacted if this HCP is approved.

WHEREAS, Costs associated with public services, education, roads and bridges, housing, etc will most likely increase during the 70-year permit period. Reducing revenue that supports these services will greatly impact our way of life.

WHEREAS, the current Environmental Impact Statement does not estimate the impacts on indirect employment or wages in local communities.

WHEREAS, inaccurate numbers were used to project loss of jobs in the Environmental Impact Statement. The Environmental Impact Statement's modeling shows 3 jobs per million board feet of timber harvested. The Forest Products Industry standard uses 11-12 jobs per million board feet of timber harvested. ODF's Environmental Impact Statement only accounts for one quarter of the jobs in the Forest Product Industry.

WHEREAS, the crude discrepancy underestimates and undervalues the impact of the loss of jobs as well as the impact on local communities. Lane County's Forest Sector jobs pay 34% more than the average annual wage.

WHEREAS, The Oregon Board of Forestry and Oregon Department of Forestry will be in direct conflict of their obligation to the counties to manage forests for the 'greatest permanent value.'

WHEREAS, The Oregon Board of Forestry and Oregon Department of Forestry is knowingly allowing this HCP to move forward using ODF's Forest Management Plan which has been proven in a court of law to be a failure. The court awarded \$1.1 billion to the counties suing the State and Board of Forestry for mismanagement of State timberlands.

WHEREAS, The Board of Forestry's decision to allow the Habitat Conservation Plan to move into the National Environmental Policy Act (NEPA) process without obtaining input and approval from the Council of Forest Trust Land Counties is appalling and needs to be addressed before moving forward.

WHEREAS, As projected in the Environmental Impact Statement for the Habitat Conservation Plan, harvest revenues will not cover Oregon department of Forestry's costs associated with this Habitat Conservation Plan. Taxpayer's will be burdened with the expense of this plan, many of whom will also be looking for work. This is even more relevant when you add in the newest projection on the startling additional 34% reduction for timber harvest levels, inflation at 6% and rising, 7% PERS increases, \$111,000,000 average fire costs, harvest reduction from the Labor Day fires and the Private Forest Accord.

WHEREAS, It's deeply concerning that the Board of Forestry and Oregon Department of Forestry would pursue a plan that would lead to its own insolvency and hinder its mission and contractual obligations. The current HCP, if implemented, would amount to gross financial mismanagement.

WHEREAS, We find it alarming that wildfire is defined as a 'disturbance' in the Environmental Impact Statement.

WHEREAS, This type of 'disturbance' is known to be most severe in passively-managed forests. Fuel loads in passively managed forests are greater than in actively-managed forests, therefore forest fire poses a significant concern to areas surrounded by passively-managed forests.

WHEREAS, forest fires also impact other industries our community relies on for revenue and health of our residents. We've watched forest fires devastate rural communities around our state.

WHEREAS, Tillamook County is surrounded by forests, we do not want to add more fuel to any possible fires.

WHEREAS, wildfires consume forests, kill wildlife, pollute our air, and damage waterways. The very animals the Habitat Conservation Plan is trying to protect are in greater danger in passively managed forest than a healthy actively-managed forest.

WHEREAS, this HCP will decimate Oregon's ability to make climate-friendly wood products- the only building material that actually stores carbon.

WHEREAS, this HCP will impact our ability to make advanced wood products like CLT for building. Wood is the only renewable and sustainable building material. The cement industry contributes 5% of the world's emissions and the steel industry contributes 8%, whereas the Forest Products Industry uses wood which sequesters carbon and locks it up unless it burns.

WHEREAS, the drastic decrease of available timber will require us to import more of our wood products from other places that don't share our commitment to sustainability and will enlarge our carbon footprint.

WHEREAS, since the 1990's we've witnessed 90% of Federal timberland and hundreds of thousands of acres of State and Private timberland not being managed properly, in part due to the Endangered Species Act being used to protect habitat. We are now witnessing the unintended consequences which are an increase of severe wildfires, longer fire seasons, loss of wildlife, loss of habitat, polluting our air, destroying watersheds, all at an accelerating financial and environmental expense.

WHEREAS, studies show that the Northern Spotted Owl's population is steadily declining, despite other Habitat Conservation Plan's dedicated to protecting and improving its habitat. After decades of our forests being set aside to protect the habitat of the Northern Spotted Owl, we now know the greatest threat to the Northern Spotted Owl is the Barred Owl not the lack of habitat.

WHEREAS, the current Habitat Conservation Plan does not address the threat of the Barred Owl on the Northern Spotted Owl, nor does it estimate future population targets of the subject species. Our concern is that the Northern Spotted Owl and other species could be used to perpetuate Habitat Conservation Area's when the other issues are not being addressed.

WHEREAS, the benefits derived from this Habitat Conservation Plan, many of which are in dispute, do not justify the socioeconomic impact, environmental impacts, obligation of the state to manage forests for the greatest permanent value, and the loss of harvest revenue we depend on.

WHEREAS, the new harvest level projections under the current HCP are startlingly lower than anticipated which will exacerbate the loss of timber harvest revenue.

THEREFORE, This Lane County Commissioner and such others as will surely join me, resolve to oppose the current Western Habitat Conservation Plan which will have drastic direct and indirect impacts on residents, our community, and our environment.

Sincerely,

A handwritten signature in black ink, appearing to read "David Loveall". The signature is fluid and cursive, with a large initial "D" and "L".

Lane County Commissioner David Loveall
Springfield District 2