



February 20, 2024

TO: House Committee on Agriculture, Land Use, Natural Resources, and Water

RE: Comments in opposition to HB 4106

Dear Chair Helm, Vice-Chair Hartman, Vice-Chair Owens, and Members of the Committee,

Please consider these comments on House Bill 4106, submitted on behalf of Cascadia Wildlands. Cascadia Wildlands is a 25-year-old, non-profit conservation organization that works to defend and restore Cascadia's wild ecosystems in the forests, in the courts, and in the streets. Cascadia Wildlands envisions vast old-growth forests, a stable climate, rivers full of wild salmon, wolves howling in the backcountry, and vibrant, diverse communities sustained by the unique landscapes of the Cascadia bioregion. Over 12,000 members and supporters across the country help sustain the organization and its movement for change.

Cascadia Wildlands strongly opposes HB 4106.

1. HB 4160 would disrupt the years-long efforts of the state to establish adequate, science-based conservation measures in a Habitat Conservation Plan.

Through the Habitat Conservation Plan (HCP), the Oregon Department of Forestry has the opportunity to support habitat maintenance and connectivity through a network of conservation areas, manage conservation areas as much-needed carbon reserves to help mitigate climate change impacts, and to prevent logging near tributary streams and around landslide-prone areas. The HCP will protect an adequate amount of habitat for imperiled species, especially considering future uncertainties due to climate change impacts, uncharacteristically severe fire, and disease. Conserving any less habitat than what is proposed by the HCP will doom imperiled species to extinction throughout the region and would likely be rejected by federal agencies who must approve the plan, opening the department up to legal challenges for failing to meet the requirements of the federal Endangered Species Act and subjecting timber-dependent communities to even greater uncertainty.

The lack of an HCP was one of the reasons Cascadia Wildlands and partners filed suit against the Oregon Department of Forestry in 2018 for the ongoing harm to threatened Oregon Coast coho salmon from steep slope logging on the state's public forests. Establishing and implementing an HCP is required under federal law. HB 4106 would threaten the implementation of the crucial, science-based conservation measures outlined in the HCP such as expanded stream buffers that are necessary to restore habitat for wild fish and minimize landslides on logged slopes.

2. HB 4160 would impede state climate goals.

The Board of Forestry adopted its first ever Climate Change and Carbon Plan in November 2021 in response to Executive Order 20-04. The HCP and companion FMP provide the Department of Forestry with the opportunity to act on the commitments in its climate plan to “position Oregon forestry as a regional leader in climate-smart forestry, including both climate-change mitigation and adaptation.” HB 4160 would require the Department of Forestry to maximize timber harvest at the expense of all other values, including carbon sequestration and storage to help mitigate and adapt to a changing climate.

We cannot continue on with operations as normal as if each year that passes is not both the hottest on record and likely the coolest we will ever experience again. The reality is this: we have an obligation to plan for the recovery of imperiled species, healthy watersheds for community drinking water, stable soils, and a livable climate now and for future generations. Intact forests are far more effective at storing carbon than young plantations and act as natural buffers to worsening climate change impacts such as flooding, erosion, drought, and uncharacteristically severe wildfire.

3. State forests are public lands that must be managed for the benefit of all Oregonians and for multiple values.

State forests offer valuable recreation opportunities when left intact: fishing, bird watching, foraging, hiking, photography, and more. Hundreds of thousands of Oregonians rely on state forest watersheds for their domestic water sources. If HB 4106 were to move forward, thousands of acres of state forests would be on the chopping block, putting essential fish and wildlife habitat, our air and water quality, recreation opportunities, and a livable climate further at risk. Conservation of intact forests now is far more cost effective than restoration of heavily logged and fragmented habitat later.

Public forests are not the appropriate place for timber maximization and the associated risks posed to imperiled species and the public. Please ensure current and future Oregonians can continue to enjoy these public lands.

Cascadia Wildlands urges you to oppose anti-conservation HB 4106.

Sincerely,



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