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October 31, 2022

Oregon Board of Forestry
Oregon Department of Forestry Headquarters
2600 State Street
Salem, Oregon 97310

Re: Oregon Department of Forestry's Draft Habitat Conservation Plan

Dear Chair Kelly and Board of Forestry Members:

On behalf of the Roseburg Area Chamber of Commerce, I am writing to express concerns about the Oregon Department of Forestry's (ODF) draft Habitat Conservation Plan (HCP) and the associated draft Environmental Impact Statement (DEIS). Roseburg and Douglas County have long benefited from the economic, social, and environmental benefits provided by a robust local forest products sector, but have also intimately felt the negative effects that a reduction in log supply from public lands can have on our communities. We urge the Board of Forestry (BOF) to consider these effects when making forest management decisions.

Roseburg is the "Timber Capitol of the Nation." Historically, the greatest wealth in the area was probably the forests and the rich harvest of timber they have produced. Pioneer saw mills cut lumber for early-day construction and lumber was exported from the mouth of the Umpqua, first by sailing vessels and later by steam schooners. After the arrival of the railroad, lumber was exported by rail, but still there were vast reserves of virgin timber untouched by logging until the start of World War II. In 1939 there were only 37 sawmills operating in the county, but by 1947 this number increased to 278, most of them engaged in cutting Douglas Fir lumber. Today there are 16 forest product manufacturing operations in our county, at least half as many as there were 30 years ago.

What is most concerning about the proposed HCP is the striking similarities to the failed Northwest Forest Plan. After setting aside millions of acres of federal forests for the Northern Spotted Owl, the species continues to decline and wildfires have drastically increased. Why is the state pursuing a plan that would repeat the same fate on state forests? Our county, our state, has felt the adverse repercussions and ripple effects of leaving our public lands unmanaged and unhealthy for decades and would hope that policymakers have learned lessons from this failure.



To advocate for and be the voice of the business community in the greater Roseburg area.

To strengthen, enhance and protect our members through political advocacy, economical development, community promotion and member programs and services.

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Also concerning is the resemblance this plan has to the attempts to manage the Elliott State Forest. We have seen multiple failed attempts to strike a balance in environmental and economic priorities on this particular state forest, only to be left with little to no harvest generated. We hope other state forests do not meet this same fate.

Furthermore, the essential services that rely on revenue from state timber harvests will have their budgets reduced as a result of the proposal. In fact, the DEIS identified four taxing districts in Douglas County that would experience reductions in revenue under the Proposed Action (see Table 3.12-22 in the DEIS). The BOF should direct ODF to do a more thorough analysis of the impacts this proposal has on the Douglas County and other rural Oregon communities before moving ahead with this plan.

The state has the opportunity and the time to draft a balanced plan that benefits at-risk species and at-risk communities alike. We hope you consider the lessons learned over the past 30 years before you change state forest management for the next 70 years.

Best regards,

ROSEBURG AREA CHAMBER OF COMMERCE



Debra L. Fromdahl, IOM
President & CEO

cc: Cal Mukumoto, Oregon State Forester
Jason Miner, Office of Governor Kate Brown

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