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Via electronic filing at www.regulations.gov

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**Re: Draft EIS Comments for Western Oregon State Forests Habitat Conservation Plan
(Docket No. NOAA-NMFS-2021-0019-0046)**

Dear National Oceanic and Atmospheric Administration (NOAA) Fisheries,

Thank you for preparing a [Draft Environmental Impact Statement \(DEIS\)](#) (Docket # NOAA-NMFS-2021-0019-0046) to comply with the federal Endangered Species Act (ESA) and National Environmental Policy Act (NEPA) in analyzing the Oregon Department of Forestry's proposed Western Oregon State Forests Habitat Conservation Plan (HCP), including the alternatives presented.

I appreciate that the Oregon Department of Forestry has undertaken an HCP and permitting process with the National Oceanic and Atmospheric Administration (NOAA) and the US Fish and Wildlife Service (USFWS) to promote conservation and minimize harm to threatened and endangered species on western Oregon's state public forests.

I support HCP **Alternative 3**.

Oregon's state-managed public forests are cherished by many. These forests, including the Tillamook, Clatsop, and Santiam State Forests, provide affordable recreation sites for hiking, fishing, camping, and more. They include crucial habitat for imperiled species including salmon, northern spotted owls, and marbled murrelets. They also provide clean drinking water for hundreds of thousands of Oregonians and act as a vital carbon sink to help fight the climate crisis. While I think that the growing pressures on fish, wildlife, water, and forests demand even stronger conservation commitments, HCP **Alternative 3** offers necessary long-term protections for fish and wildlife in the face of climate change impacts.

This alternative would designate important aquatic and terrestrial habitats on the Tillamook and other state lands as dedicated stream and forest conservation areas for 70 years. It would also advance improved steep slope logging protections and attention to excessive road network impacts. Dedicated conservation areas and related conservation strategies need to remain robust in nature, continuity, and size given the relatively fragmented and young condition of these state forests.

Situated amidst a sea of industrial timberland clearcuts with restricted public access, western Oregon's state public forests play an increasingly important role on the landscape for conservation and broader values today, including recreation, climate resilience, and drinking water.¹

The state's HCP proposal was developed using an extensive public process and scientific engagement that included reviews by public agencies and numerous resource specialists on fish, wildlife, water quality, and forest management. A counterproposal developed by the Council of Forest Trust Land Counties (CFTLC) was not. I do not support CFTLC's proposal or any alternative that would increase clearcutting and pesticide spraying on state forests while decreasing conservation commitments.

Historically and currently, a timber-centric approach has ruled the management of Oregon's state public forest lands, to the detriment of native species, drinking water sources, and enjoyment of these forests. **We can and must do better for our forest lands, rivers and streams, climate stabilization, drinking water supply, public recreation, and wildlife.** HCP **Alternative 3** is an affirmative step in that direction.

Thank you,

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¹ Buotte, P.C., Law, B.E., Ripple, W.J., and Berner, L.T. Carbon sequestration and biodiversity co-benefits of preserving forests in the western United States. Dec. 2019, <https://doi.org/10.1002/cap.2039>.

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