



November 14, 2023

Via Electronic and Certified Mail

The Honorable Tina Kotek
Office of the Governor
900 Court Street NE, Suite 254
Salem, Oregon 97301

Board of Forestry
Oregon Department of Forestry Headquarters
2600 State Street
Salem, Oregon 97301

Re: Request to Expand Habitat Conservation Areas in the Western Oregon State Forests HCP

Dear Governor Kotek and Board of Forestry Members:

The ten undersigned conservation groups urgently request you to direct the Oregon Department of Forestry (“ODF”) to protect additional acres in the network of Habitat Conservation Areas (“HCA”) in the proposed Western Oregon State Forest Habitat Conservation Plan.

Specifically, we ask you to include in HCAs all stands older than 80 years on the Tillamook and Clatsop State Forests, particularly those older stands adjacent to proposed HCAs. Currently, roughly 30 percent of older stands are not included, which—given the rarity of late-seral forests on the North Coast and their importance to endangered species and climate resiliency—is a critical omission. The importance of protecting mature and old-growth forests was recently memorialized in an executive order by President Biden, which characterized “mature and old-growth” forests as “cherished” and “critical to the health, prosperity, and resilience of our communities.” Although this order was directed towards federal public lands, we firmly believe these forests are equally critical within Oregon’s state forests and should be protected.

We also ask you to include the Cook Creek watershed as an additional HCA. This watershed lies in the heart of Oregon’s Tillamook State Forest, flowing into the Nehalem State Scenic Waterway just east of Nehalem Bay. It provides ecologically important, relatively undisturbed habitat for many imperiled species, including species protected under state and federal law. Most significantly, it provides critical habitat for the Oregon Coast coho salmon (*Oncorhynchus kisutch*) and the marbled murrelet (*Brachyramphus marmoratus*), both threatened species under the federal Endangered Species Act. It also is a cherished stream for recreational fishing and has the potential to be a recreational mecca that would further support coastal communities.

ODF is planning to rebuild Cook Creek Road to provide access for logging in the interior Cook Creek watershed—it has been closed to logging since 2015 when a road segment washed into Cook Creek during winter storms. Although FEMA recently revoked over \$1 million in federal disaster relief funding for ODF in response to concerns raised by the Center for Biological Diversity and Cascadia Wildlands about the agency’s failure to consider the impacts to Oregon Coast coho and marbled murrelets, ODF maintains that it is committed to rebuilding the road with or without FEMA funding.

ODF has at least two timber sales planned to occur in Cook Creek watershed once Cook Creek Road is rebuilt, which will clearcut nearly 700 acres and construct roads on steep slopes above Cook Creek. These timber sales are likely to harm not only critically threatened Oregon Coast coho salmon and marbled murrelets, but also water quality.

The Cook Creek watershed is characterized by steep, landslide prone slopes that, when logged and roaded, are likely to deliver large quantities of harmful fine sediments to Cook Creek and thereby harm designated critical habitat for Oregon Coast coho. This is evidenced by the 2015 road washout as well as a landslide generated by Cook Creek Road that is clearly visible on Google Earth (see image provided below). Re-opening Cook Creek Road and logging the watershed's steep slopes will certainly result in more landslides and sedimentation harmful to fish and water quality. NOAA Fisheries has identified logging on steep slopes and constructing and maintaining roads as activities that cause "take" of Oregon Coast coho salmon precisely because of these types of erosional events.

Logging in Cook Creek watershed will also degrade and diminish marbled murrelet nesting habitat by removing nest trees, fragmenting habitat areas, increasing noise disturbance, and increasing exposure to predators in the area.

In sum, opening the Cook Creek watershed to clearcut logging would likely harm Oregon Coast coho and marbled murrelets, as well as many other ecologically important species that inhabit Oregon's Coast Range. It will also increase the risk of wildfire, deplete a source of fresh water, threatening Oregon's coastal communities, and greatly diminish fishing and other recreational opportunities in this high-quality area.

Accordingly, we respectfully and urgently request that you direct ODF to protect all late-seral forests (over 80 years old) on the Tillamook and Clatsop State Forests and the Cook Creek watershed in HCAs protected under the Habitat Conservation Plan.

Thank you for your attention to this important matter.

Sincerely,



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cc:

Oregon Department of Forestry



1 GoogleEarth screengrab of visible landslide generated by Cook Creek Road.



2 Photo of the section of Cook Creek Road that washed out into Cook Creek, image taken April 2023.