



Date: February 28, 2025

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

From: State Forest Coalition organizations

**RE: Please oppose HB 3103 and -1 amendments**

Chair Helm, Chair Owens, Vice Chair McDonald and Members of the Committee:

On the behalf of the State Forest Coalition, including the groups signed below, we ask that you oppose HB 3103-1.

HB 3103-1 would be a significant departure from current management practices for state forests. It would require state forests to be managed primarily for logging at the expense of clean water, salmon and wildlife habitat, and recreation.

HB 3103-1 prioritizes timber harvest over other values on state forests, upsetting the current balance requiring state forests to be managed for multiple values to benefit all Oregonians. The bill requires the state forester to set timber harvest targets through rulemaking, which would preempt all other plans, policies or directives made by the Board of Forestry. These include policies protecting fish and wildlife habitat, clean water and recreation.

The bill would undermine the Western Oregon State Forest Habitat Conservation Plan (HCP). The HCP provides balanced protection for 17 species of salmon and wildlife that are listed under the federal Endangered Species Act. The Oregon Department of Forestry (ODF) is currently following the guidelines of the HCP, while awaiting final approval by federal agencies. HB 3103-1 would prohibit ODF from using the HCP until it is approved by federal agencies, allowing clearcuts in habitat currently protected by the HCP. Given the Trump Administration's cuts to federal agencies, final approval could be delayed for years.

It would also undermine ODF's ability to implement its Climate Change and Carbon Plan (Climate Plan). Adopted by the Board of Forestry in 2021, the Climate Plan's goal is to establish Oregon as a national leader in climate-smart forestry, including longer rotation ages between harvests and a carbon market program for state forests. HB 3103 requires a rule establishing 10-year harvest levels that would preempt the Climate Plan, which is not adopted as a rule.

HB 3103 would result in more litigation by creating a new right to sue the ODF over state forest timber harvest plans to obtain court orders that effectively compel more clearcuts on public land.

Finally, HB 3103 is unnecessary. The state forester already sets ten-year harvest level goals that are required to be consistent with all other state forest values, policies and plans. The ODF issues annual reports on progress meeting these harvest levels and has a solid track record of meeting harvest goals. The ODF provides public review and opportunities to comment on draft Forest Management Plans, Implementation Plans and Annual Operating Plans. The ODF is in the process of updating its Key Performance Measures (KPMs) to include reporting on timber harvest, and reports progress on meeting these KPMs on a biennial basis to the Legislature.

For the reasons stated above, we ask that you please oppose HB 3103-1. Thank you for considering these comments.

Sincerely,

Joe Liebezeit  
Statewide Conservation Director  
Bird Alliance of Oregon

Bob Rees  
Executive Director  
NW Guides and Anglers Association

Nancy Webster  
President  
North Coast Communities for Watershed  
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