



3/2/25

Co-Chairs Helm and Owens, and Members of the Committee,

I am writing on behalf of 350PDX, a volunteer-led climate advocacy organization, to oppose HB 3103. Over the last four years, 350PDX volunteers and staff have engaged with the Board of Forestry and Oregon Department of Forestry staff to support ODF's Climate Change & Carbon Plan, which the Board unanimously approved in November 2021, and the Habitat Conservation Plan for Western State Forests, which the Board adopted in a split decision in March 2024. For both of these plans, and especially for the state forest HCP, we witnessed ODF staff and the Board balancing multiple priorities and legal obligations to make decisions that will have the most beneficial long-term effect for the people and land of Oregon.

HB 3103 undermines the expertise of the Oregon Department of Forestry and is an unnecessary legislative intervention into agency management. The state forester already sets ten-year harvest level goals, though not by rule, and they are subject to all other values, policies and plans. This gives the agency flexibility to adapt harvest levels to account for unforeseen changes in the environment or market. The ODF issues annual reports on progress meeting its harvest levels and has a solid track record of meeting these goals.

HB 3103 and its proposed amendment would upset the balance that ODF has been working to achieve by preempting other plans, policies or directives made by the Board of Forestry in favor of timber production. These include policies protecting fish and wildlife habitat, clean water and recreation.

After countless years of uncertainty and litigation, the state forest HCP is intended to result in that sustainable level of harvest that this bill purports to desire. By adding uncertainty about the HCP back into the mix, this bill could have the unintended effect of reopening the state forests to more time consuming litigation around ODF's legal obligation to meet state and federal environmental laws.

I encourage this committee to recognize the good work of ODF, the Board of Forestry, and the community stakeholders who have given years of their time to achieve a delicate balance in the western state forests. HB 3103 could disrupt this balance and should not move forward in this legislative session.

Thanks for your consideration of these comments,

Brenna Bell
Forest Climate Manager, 350PDX