



To: House Committee on Agriculture, Land Use, Natural Resources, and Water
From: Consolidated Oregon Indivisible Network (COIN)
Re: Testimony in opposition to HB 3103
Date: March 3, 2025

Co-Chair Helm, Co-Chair Owens, Vice Chair McDonald and members of the House Committee on Agriculture, Land Use, Natural Resources, and Water

I am writing on behalf of the Consolidated Oregon Indivisible Network (COIN) to express our opposition to HB 3103 -1. COIN is a coalition of over 50 local Indivisible groups, spanning all regions of Oregon, that cooperate and amplify their efforts to advance federal and state legislation and engage with elected officials to promote progressive causes that benefit all Oregonians.

We strongly oppose HB 3103 -1. This bill would significantly change the way state forests are managed. Currently, management of state forests requires a balance of multiple values, including habitat, clean water, fish and wildlife, and recreation. This bill would require the Oregon Department of Forestry (ODF) to establish a harvest level **by rule** that prioritizes timber harvest over other values. HB 3103 undermines all other plans, policies or directives issued by the State Forester or the Board of Forestry.

Example 1: ODF currently follows Habitat Conservation Plan (HCP) guidelines, while awaiting final approval by federal agencies. According to the language in the -1 amendment, this bill would disallow the ODF from using the HCP until it is approved by federal agencies:

Section 1...(4) When determining a sustainable timber harvest level to adopt, the State Forester must take into account: ... (b) All applicable federal and state legal requirements, including any applicable requirements under: A) A habitat conservation plan approved by the National Marine Fisheries Service or the United States Fish and Wildlife Service.

Given the Trump Administration's cuts to federal agencies, final approval could be delayed for years. Despite multiple statements by supporters of the bill (during the public hearing on March 3) that the HCP would be accommodated in HB 3103, the language of the bill would suggest otherwise.

Example 2: In 2021, the Board of Forestry adopted a Climate Change and Carbon Plan (CCCP) for state forests to establish Oregon as a national leader in climate-smart

forestry. However, HB3103 -1 requires a rule establishing 10-year harvest levels that supersedes the Climate Plan. To this point, during the public hearing on March 3, a Chief Sponsor of the bill stated, in reference to including the CCCP, “We asked ODFW ‘would you like that in this bill?’ and they said ‘no’”. This statement is in no way reassuring that plans, policies or directives issued by the Board of Forestry will not be superseded or undermined by HB 3103.

An additional worrisome feature is that HB 3103 would establish a new right to sue the ODF over state forest timber harvest plans and obtain court orders to compel more clearcuts on public land. This is menacing and litigious.

In summary, HB 3103 is unnecessary. Sustainable harvest levels are already required by law. The State Forester already sets 10-year harvest level goals, **though not by rule**, that are subject to all other values, policies and plans.