



**BACKCOUNTRY
HUNTERS & ANGLERS**
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April 3, 2025

House Committee on Climate, Energy, and Environment
Oregon State Capitol
900 Court Street NE
Salem, OR 97301

Oregon BHA Urges You to Vote NO on HB3846

Dear Members of the Committee,

On behalf of the Oregon Chapter of Backcountry Hunters & Anglers (BHA), I am writing to strongly oppose House Bill 3846, which proposes leasing the Ochoco National Forest to the Oregon Department of Forestry (ODF). While we recognize the importance of forest restoration and wildfire mitigation, we have significant concerns about the potential implications of this proposal for public access, recreation, and environmental oversight.

BHA supports the multiple-use mandate of federal lands under the Federal Land Policy and Management Act (FLPMA), which ensures that these lands are managed for a variety of purposes. As part of this mandate, BHA is committed to preserving and protecting public access to lands for hunting, angling, and other outdoor activities that are vital to Oregon's outdoor heritage and economy.

We are concerned that the leasing arrangement in HB 3846 could be a thinly veiled attempt to transfer federal lands to state control, circumventing National Environmental Policy Act (NEPA) oversight and the federal laws that govern multiple use of public lands. NEPA ensures that federal land management decisions are subject to rigorous environmental review, protecting the long-term health of our ecosystems. By leasing federal lands to the state, HB 3846 potentially reduces the level of federal oversight and the public participation required under NEPA, leaving decisions about forest health, habitat restoration, and wildfire mitigation to state-level processes. This shift could lead to politically-driven decisions that do not fully consider the long-term environmental consequences, undermining the accountability that NEPA provides to all Americans.

The bill would significantly expand the Oregon Department of Forestry's (ODF) management area by adding 845,498 acres to its existing 738,402 acres of state forest lands, more than doubling the current acreage. This would create a nearly eightfold increase in forestland management east of the Cascades, at a time when ODF is already struggling with budget issues and leadership challenges. The expansion would likely result in a capacity shortfall, as ODF is not equipped to manage such a large area, particularly for recreation, restoration, and wildfire response. Without the U.S. Forest Service's multiple-use management model, this shift could push the Ochoco National Forest toward timber harvest as the dominant management focus under ODF.

Existing programs like the Good Neighbor Authority (GNA) and the Collaborative Forest Landscape Restoration Program (CFLRP) already demonstrate effective collaboration between state and federal



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agencies, with a focus on forest restoration, wildfire resilience, and ecological health, all while maintaining public access and NEPA compliance. Projects such as the Middle Fork Willamette River Landscape Restoration and the Deschutes Collaborative Forest Project show that we can successfully reduce wildfire risk, restore forest ecosystems, and improve habitat without the need for leasing or transferring ownership of federal lands. These partnerships rely on shared stewardship and uphold public interests, including the protection of access to hunting, fishing, and other recreational pursuits.

In addition, our members have long advocated for transparent, science-based management of public lands that preserves both ecological integrity and recreational opportunities. Leasing federal lands undermines this balanced approach, potentially prioritizing commercial uses over conservation and public access. It also risks setting a dangerous precedent for further privatization of Oregon's public lands, ultimately diminishing opportunities for future generations to enjoy and benefit from these lands.

For these reasons, Oregon BHA strongly urges the Committee to reject HB 3846 and to support policies that continue to promote collaborative management, public access, and rigorous environmental review. We believe that alternative approaches, such as expanding the Good Neighbor Authority and CFLRP efforts, offer a more sustainable and inclusive path forward for managing our public lands.

Thank you for considering our concerns.

Sincerely,

Ian Isaacson
Oregon Chapter, Backcountry Hunters & Anglers



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