

**Submitted:** Tue 09/06/2022 7:19 AM

**Subject:** Rulemaking

Re: Agenda Item #1

**Comment:**

RE: Private Forestry Accord Draft Rules September 6, 2022 Dear Members of the Oregon Board of Forestry, Respectfully, I ask you to support and adopt the draft rules as written for implementing the Private Forestry Accord. At the end of 2019 and on into the first half of 2020, it was my honor to manage the initial project to build the foundation of the Private Forestry Accord. As you know, Senate Bill 1602 passed during a special session of the Legislature on June 26, 2020. It was the first step. In addition to formalizing the Private Forest Accord, it increased drinking water protections on our private forestlands. Watching from afar, I know all sides poured their souls through difficult compromise into Senate Bills 1501 and 1502 which Governor Brown signed into law. Before you now are the draft rules for implementing the Private Forest Accord. The agreement and proposed rules are a product of more than two years of negotiations among devoted Oregonians with very different perspectives. They put aside their differences, came together, and stayed at it reaching a historic agreement. A remarkable achievement often known as the "Oregon Way". These rules ensure Oregon's forests and timber industry remain healthy and continue to support tens of thousands of family wage jobs in rural Oregon. The rules are a balanced approach to support both conservation values and economic viability for Oregon's rural communities. This is good for all Oregonians. Please adopt the proposed rules as written and support this new era of forestry in Oregon.

Thank you. Peace and blessings to you all, Greg Miller (Forester, retired)

August 16, 2002

Board Support Office  
Dept. of Forestry  
2600 State Street  
Salem, Or 97310

Susan Murbach  
P.O. Box 834  
Waldport, Or. 97394

Dear Madames and Sirs,

I am writing today to add my voice and thoughts to the B.O.F. meeting on 9-8-22.

As an owner of forest property and having adjoining land to Siuslaw National Forest, with BLM and Weyerhaeuser 1/4 mile away I am concerned with conventional forestry practices entailing herbicide applications. I utilize ground water (for over 40 years) for drinking, bathing and garden plantings.

Please consider a moratorium on herbicide sprays until water testing has been done by independent laboratories.

Also be open to alternative management practices that do not entail carcinogenic sprays.

Sincerely, Susan Murbach 8-16-22  
Susan Murbach



## OREGON CHAPTER SIERRA CLUB

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SIERRA  
CLUB

FOUNDED 1892

September 1, 2022

Oregon Board of Forestry  
2600 State Street  
Salem, Oregon 97310

Dear Chair Kelly and members of the Board,

Thank you for the opportunity to comment on issues facing the Board and the Department of Forestry.

The Forest Team of the Oregon Chapter Sierra Club urges the Oregon Board of Forestry to take steps to further the implementation of ecological management of our state forests wherever commercial logging occurs, and to phase out reliance on the industrial model that has been the dominant practice of extractive forestry. The term “ecological forestry” is not new. President Biden’s Executive Order calling for protection of mature and old growth forests has both the U.S. Forest Service and the Department of the Interior looking at various models of ecological forest management (the book *Ecological Forest Management* by Jerry Franklin, K. Norman Johnson & Debora L. Johnson, which came out in 2018, is one well-known example). While the recently passed Oregon Private Forest Accord legislation nudges forestry practices in that direction, a much larger shift is required to address the climate and biodiversity crises we face. The document below outlines some of the aspects of such a shift. We look forward to engaging with you and the Department of Forestry to support steps toward their adoption.

### **Moving Toward an Ecologically Managed Forest**

The decades-old practice of industrial forestry is not sustainable. This practice of extractive logging on public and private lands is dominated by clearcuts, logging roads, and timber plantations. The loss and degradation of natural forest ecosystems is driving climate change and amplifying the severity of heat waves and drought, posing significant public health and safety risks by amplifying their effects on water shortages, wildfires, landslides, floods, invasive species and other stressors already on the rise due to climate change. Although forests are not like a crop of corn, those employing industrial forestry continue to genetically accentuate rapid regrowth, in order to liquidate the forest and regrow it. Industrial forestry practices have both immediate and generational consequences. Fire danger is radically increased following clear cuts because once trees and understory are removed, hotter, windier, and drier conditions are created (see [Have western USA fire suppression and megafire active management approaches become a contemporary Sisyphus?](#))

Another negative consequence of the industrial model is its effect on bird species and insects. Insect-eating birds are a major part of an intact forest, helping to keep the ecological balance. But

once the trees are removed, seed-eating birds replace the insect eaters and thus the insect infestations become common and overwhelming. The soil, the primary resource in the landscape, is essentially spent and compromised by the 3<sup>rd</sup> generation of clear cutting because it chops the soil, rips the layers of fungi and microbes, and creates little gullies that wash away the topsoil. Sadly, today Timberland Investment Management Organizations (TIMOs) and Real Estate Investment Trusts (REITs) have taken over the ownership of many private forestlands with one goal in mind—maximizing short term profits.

By contrast, an ecological model of forestry places utmost importance on carbon sequestration. Our forests store billions of tons of carbon dioxide that would otherwise end up in the atmosphere, and they also help regulate local temperature and precipitation patterns—functions that are arguably as important as their carbon-storing potential. OSU scientist Dr. Beverly Law writes, “Climate change mitigation and biodiversity protection are an essential part of forest management decision making” ([The Status of Science on Forest Carbon Management to Mitigate Climate Change](#), March 9, 2022).

The current practice of herbicide use, most especially aerial herbicide spraying, must come under scrutiny. Herbicide spraying is toxic to aquatic invertebrates and fish because it kills algae, insects, and aquatic plants, effectively destroying their food base. It contaminates vital sources of drinking water for both wildlife and human communities, and has no place in an ecological forest management model. In such a model, older and more complex tree strands along waterways provide protection for salmon and steelhead and support the recovery of endangered species.

An ecological model of forestry moves away from even-aged timber management toward heterogeneous forest stands of varied layers and ages. Unlogged forests of varying strands, especially older trees, provide high canopy cover, wind breaks, and a cooler and shadier microclimate. Naturally occurring fires are almost always less severe in such a landscape, and natural fires provide important snag habitat for many species of birds and small animals. An ecological model recognizes that natural disturbance events occur as an integral part of the forests’ cycles, and allows the diversity and complexity of the forest to recover rapidly for a variety of plant and animal species. Forest regeneration following a natural burn becomes a carbon sink. Snagged trees retain carbon, and the soil, undisturbed (unlike the industrial model), remains a major source of carbon retention. Furthermore, the current industrial trend toward forest bioenergy and burning of wood pellets add significantly more carbon dioxide per unit of energy to the atmosphere than the burning of fossil fuels.

There are three key transitions that we need to embrace as a function of ecologically sustainable forestry: from volume to value added; from corporate control to local control; and from capital intensive to labor intensive. These three transitions could and should be at the heart of an ecological model of forestry. Taking the philosophy ‘less is more’ and applying it to management in our forests is in many ways the opposite of industrial forestry and could go a long way in reversing the negative impacts of the past.

The Forest Team of the Oregon Chapter supports the adoption of an ecological model of forestry for Oregon that recognizes forests as complex “ecosystems with diverse biota, complex structure, and multiple functions, and not simply collections of trees valuable primarily for production of wood” (Franklin, Johnson, and Johnson, *Ecological Forest Management*). We urge the Board to consider

ways to adopt these aspects of an ecological forest management model when making decisions about implementation of the CCCP, the HCP, and for other current and future forest planning.

Thank you for your consideration,

Carol Valentine, Forest Team Coordinator  
Oregon Chapter Sierra Club  
[illinoisvalley@oregon.sierraclub.org](mailto:illinoisvalley@oregon.sierraclub.org)

CC: Cal Mukomoto, State Forester

Asian American Timberland Owners Assn.

Board members of  
The ODF

Bill Thompson, Spokesman  
503-415-1638

Members:

Sept. 7, 2022

This Survey started with letters + phone calls from our members + the general public. It sets forth Seven of their most common profound sentiments about the "Accord".

I only surveyed/poll members of the Association and of the general Oregon public and other Asian business owners in Oregon that indicated they had read the Accord.

My wife and I did not poll ourselves. However, she and I both disagree with two of the criticisms (sentiments).

21% of those polled disagreed with up to 5 of the criticisms.

9% of those polled disagreed with all the criticisms.

59% of those polled agree with all the criticisms.

11% of those polled agree with 5 of the criticisms.

The Criticisms are as follows:

ONE: The Authors of the Accord unjustly prohibited the ODF Board + ODF Professionals from speaking or having any input in the legislative process.

TWO: Only one or two members of the ODF Board seem righteously upset about this and willing to seriously oppose the Accord Authors in the rule making process.

THREE: The Accord will cause an unjust taking of approx. 25% of the Land and timber on the average small privately owned woodlot in Oregon - without Just Compensation.

FOUR: The Accord's suggested tax credits are a pittance, and are not based on appraisal values, etc.

FIVE: The Accord Authors have extremely over-reached in trying to <sup>get</sup> Owners to deed conservation easements on an irrevocable basis, & giving contradictory written lip service that they could be revocable later with the permission of the state.

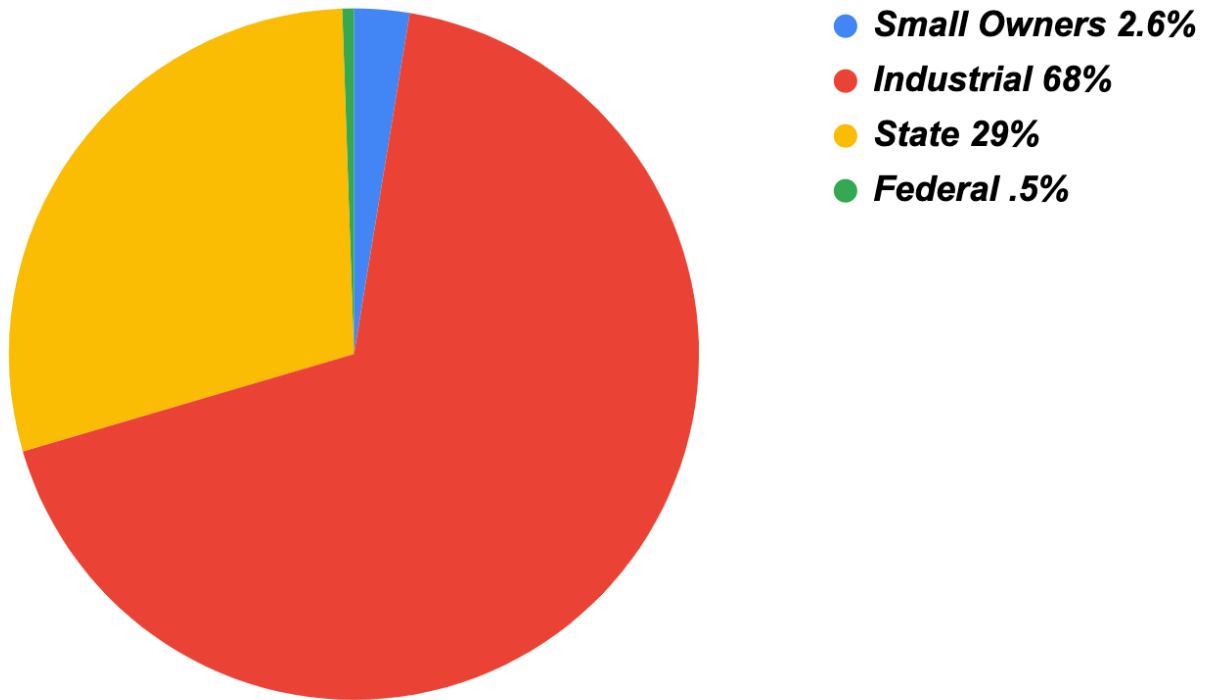
SIX: The Accord unjustly encourages the Trespassing of members of the public on private lands.

SEVEN: Hypocritically, The Accord Authors exclude the State owned lands & timber from the same regulations to which they subject private land owners.

*Bob Simpson,*

Spokesman for the ASIAN AMERICAN TIMBERLAND OWNERS ASSOCIATION

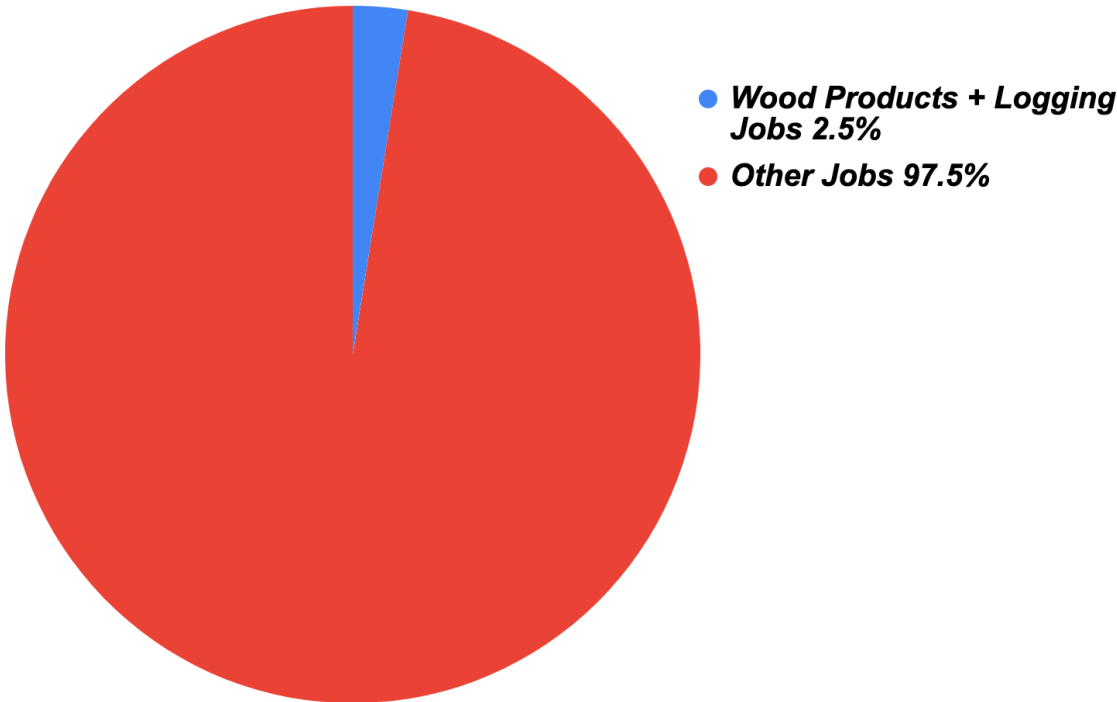
Harvest Clatsop County 2002-2020



***PRIVATE INDUSTRIAL HARVEST IS MAIN DRIVER OF LOG SUPPLY IN COUNTY***



**WOOD PRODUCTS MANUFACTURING + LOGGING JOBS IN CLATSOP COUNTY 2012-2021**

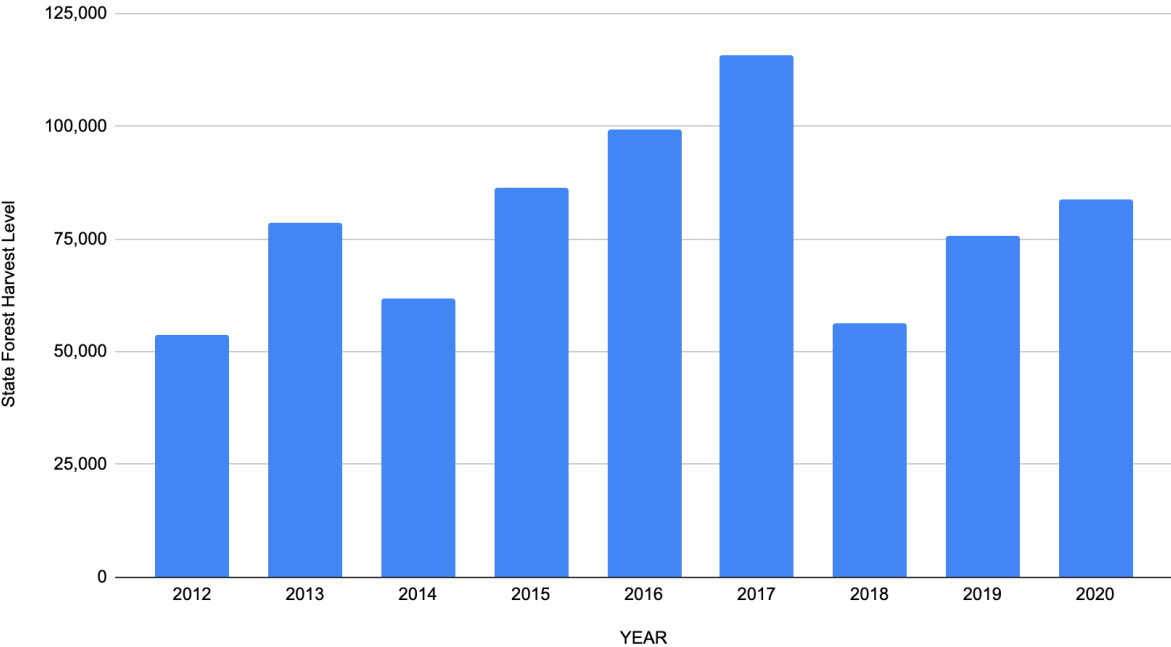


**STATE FOREST 29% of HARVEST**

**29% of 2.5% of jobs is .75% of jobs**

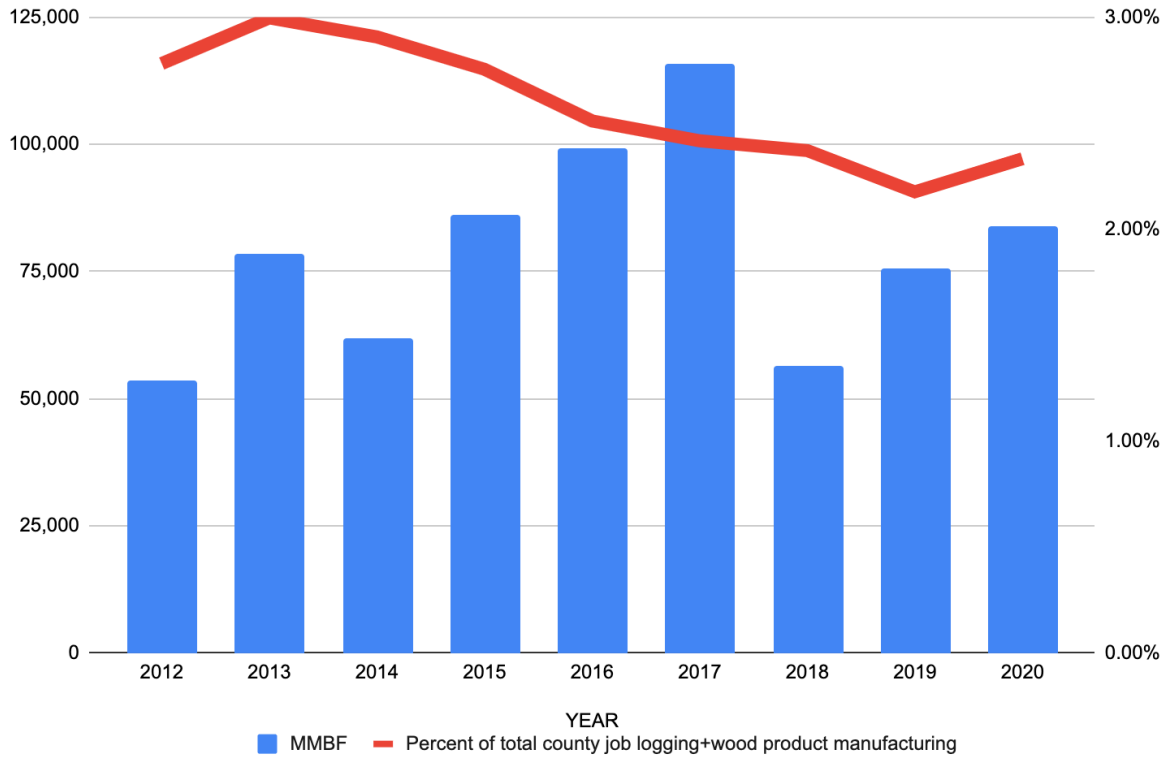
# STATE FOREST HARVEST VARIES

State Forest Harvest Level in Clatsop County 2012-2020



***ARE THESE SIGNIFICANT CHANGES IN STATE FOREST HARVEST CORRELATED WITH CHANGES IN WOOD PRODUCTS AND LOGGING JOBS?***

### State Forest Harvest Level and Wood Products+Logging as a Percent of all Jobs in Clatsop County



***SUGGESTION: GET YOUR ODF ECONOMIST TO BRIEF YOU ON EFFECT OF MARGINAL CHANGES IN HARVEST ON LOCAL FOREST INDUSTRY JOBS IN SPECIFIC COUNTIES OVER SPECIFIC TIME PERIODS***

# WILL MILLS CLOSE BECAUSE OF DECREASE IN STATE FOREST HARVEST?

The screenshot shows the Hampton Lumber Mills website with a red navigation bar containing: OUR COMPANY, PRODUCTS, OPERATIONS, SUSTAINABILITY, NEWS, and RECREATION. The main content area is titled "HAMPTON LUMBER MILLS" and features four mill profiles:

- Willamina:** 100% Douglas fir. Annual production capacity of 500 MMBF. Products include Framing lumber (green and kiln dried), Lam stock (ALS & Metric), and Japanese twinline (2x4 to 2x14, 8' to 28'; 3x6 to 3x12, 8' to 28'; 45mm x45 to 105mm, 3 to 4M). WWPAs include grading, paper wrap, anti-stain, kiln drying, and bar coding upon request. Products are shipped from Willamina via the BN and UP rail, truck, and cargo-Portland. Contact: 1000 Willamina Creek Rd., Willamina, OR 97396, Phone: 503.876.2322, Manager: Brad Blackwell, Log Buyer: Jeff Clevenger, Log Buyer Phone: 503.365.8400.
- Tillamook:** 100% Hem fir. Annual production capacity of 240 MMBF. Products include Framing Lumber 100% Hem Fir sold both domestic and export, Structural Light Framing KD 2x4 in 6' to 20' lengths, Structural Joists and Planks KD 2x6 through 2x12 in 6' to 26' lengths, and Green 3" and 4" thicknesses in 4" through 12" widths in 8' to 24' lengths. WWPAs include grading, paper wrap, kiln drying and bar coding available upon request. Products are shipped from Tillamook via BN or UP rail, truck and cargo-Portland. Contact: 3111 Third St., Tillamook, OR 97141, Phone: 503.842.6641, Manager: Mark Elston, Log Buyer: Dave Kunert, Log Buyer Phone: 503.815.6321.
- Warrenton:** 60% Douglas fir, 40% Hem fir. Annual production capacity of 200 MMBF. Products include Framing and stud lumber (kiln dried) 2x4 to 2x12, 8' to 20'. Contact: 550 NE Skipanon Drive, P.O. Box 469, Warrenton, OR 97146, Phone: 503.861.5300, Manager: Lois Perdue, Log Buyer: Dave Kunert, Log Buyer Phone: 503.815.6321.
- Banks:** 100% Douglas fir. Annual Production Capacity of 85 MMBF. Products include 2x4 and 2x6, 6' to 20' framing lumber (green). Contact: 13620 NW Commerce Street, Banks, OR 97106, Phone: 503.324.2681, Manager: Dave Keyser, Log Buyer: Tyler Robbins, Log Buyer Phone: 503.324.2681.

## Hampton Mill Annual Production Capacity Near Clatsop County

1.025 BILLION BF PER YEAR

EXAMPLE:

TOTAL STATE FOREST HARVEST DROPS 50MMBF

ASSUME HAMPTON WOULD HAVE BOUGHT HALF THAT – 25MMBF

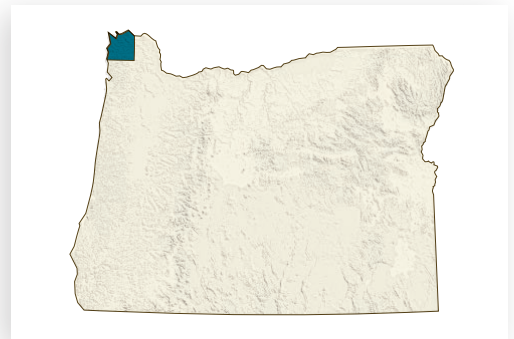
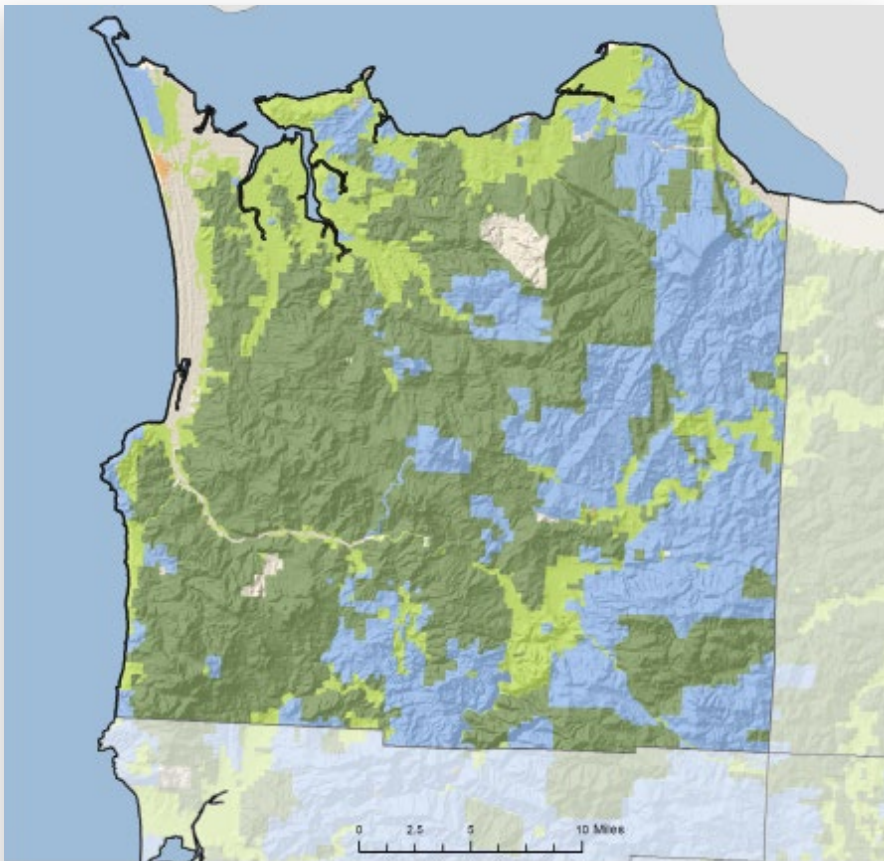
EQUATES TO APPX. 2.5% of HAMPTON MILL CAPACITY

**Timber Harvest Data: ODF**

**Employment Data: Oregon Employment Office**

**Hampton Data: Hampton Website**

# CLATSOP COUNTY



## LAND AREA (thousands of acres)

Total land	529
Total forestland (87%)	461

## FORESTLAND OWNERSHIP (thousands of acres)

Federal	2
Large private	259
Small private	78
State and other public	122
Tribal	0
<b>TOTAL</b>	<b>461</b>

## TIMBER HARVEST (thousands of board feet)

Federal	0
Large private	166,123
Small private	7,103
State and other public	118,164
Tribal	0
<b>TOTAL</b>	<b>291,390</b>

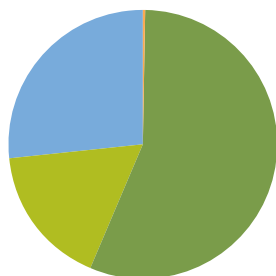
## FOREST SECTOR JOBS

Forest sector jobs	1,315
% of county employment	6.3
Average annual wage	\$70,599
% of average county wage	192

## PRIMARY WOOD PROCESSING

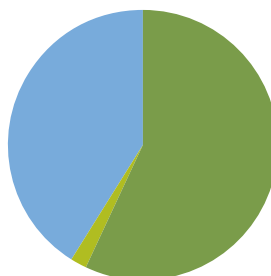
Sawmills	1
Pulp and board plants	1
Engineered wood plants	1
Other facilities	1
<b>TOTAL FACILITIES</b>	<b>2</b>

### FORESTLAND OWNERSHIP



<1%	FEDERAL	0%
56%	LARGE PRIVATE	57%
17%	SMALL PRIVATE	2%
26%	STATE AND OTHER PUBLIC	41%
0%	TRIBAL	0%

### TIMBER HARVEST BY OWNER



2017

# Oregon counties with greatest forest sector wage differences (2019)

