

Printed Name: John Griffith
 Affiliation: Coos County, FTLAC
 Mailing Address: 250 N. Baxter
 Oriskany 97423

Please describe the proposed issue [in 500 words or less]:

Board of Forestry-managed lands' poor return on asset value. Revenue must increase, or state should transfer land back to Counties for more appropriate management.

Board should, through OAR authority, prioritize forest management and social/economic well-being as ~~the~~ chief purpose of the lands to the maximum degree w/in B.O.F. authority

Return to: Oregon Department of Forestry
 Attn: Dan Postrel, Agency Affairs
 2600 State Street, Building B
 Salem, OR 97310

before July 31, 2007

AGENDA ITEM 7
 Attachment 7
 Page 1 of 179

-----Original Message-----

From: tbender@nehalem.tel.net

[mailto:tbender@nehalem.tel.net]

Sent: Thursday, June 07, 2007 10:20 AM

To: BOF Issues Manager

Subject: 2007 BOF Issue Suggestions

Suggested Issues for
the Board of Forestry to consider in 2006

First Name: Tom
Last Name: Bender
Email: tbender@nehalem.tel.net
Address1: 38755 Reed Rd.
City: Nehalem
State: OR
Zip: 97131
Company:
Title:
Phone: 503 368-6294
Contact by: E-Mail
Issue Description: FOUR ISSUES:

IP 3
1. Evaluation of global warming implications for Oregon forests and need for species variety in planting, insect vulnerability, temperature ranges, etc.

IP 4
2. Review State Forestry Act to require achieving the greater economic, ecological, and productivity benefits of longer rotations on both private and public lands. See for example
<<http://www.tombender.org/factor10econarticles/forestry.pdf>>

IP 5
3. Remove present value accounting (future discounting) from evaluation of benefits of forest lands. See for example
<www.tombender.org/factor10econarticles/foreclosingfuture.html>

IP 6
4. Review payment policies to coastal Trust Counties where ODF failure to plant disease-resistant stock has resulted in reduced productivity and therefor revenues to the counties.

-----Original Message-----

From: bpoddar@centurytel.net
[mailto:bpoddar@centurytel.net]
Sent: Tuesday, June 05, 2007 12:00 PM
To: BOF Issues Manager
Subject: 2007 BOF Issue Suggestions

Suggested Issues for
the Board of Forestry to consider in 2006

First Name: bhagwati
Last Name: poddar
Email: bpoddar@centurytel.net
Address1: 43804 Sylvandale Lane
City: astoria
State: or
Zip: 97103
Company: an ordinary citizen
Title: dr.
Phone: 503-458-5145
Contact by: Postal Mail
Issue Description: To the Board of Forestry:

7
There are at least two very important issues confronting the Board. One of those issue is the issue of buffers for small streams, perennial and intermittent. The Board has, despite clear-cut science, pussyfooted around that issue numerous times because it does not wish to offend its primary client, the timber industry. Although the Board pretends to represent the public, it does not, either in the manner of its composition or the policies it supports and makes. If Board were to follow the science and increase the no-cut buffers for small streams to 100 feet, it would, specially in the western portion of the state, bring down upon itself the wrath of that small minority to which the Board owes it allegiance, the timber industry. But if the Board truly represented the public weal, it would follow the science where it leads and let the chips fall where they will.

10 8
The second issue, perhaps the most important issue, is the Board itself. Is the Board educable? Can it understand that the overwhelming majority of Oregonians is urbanized? Can it understand that the things that Oregonians most cherish about their state are the forests, the streams and the quality of life to which both are integral? Can it understand that that's what attracted

them here in the first place and keeps them here? Can it understand that a tree farm is not a forest and that the Board's obsession with clear cutting is the very antithesis of the quality of life that Oregonians cherish and want for themselves and their children? Can the Board understand that it cannot have its cake and eat it too? Can it understand that it cannot serve the timber industry fully and yet serve the permanent interest of all Oregonians in their forests and streams? Can it understand that, in a world in which the quality of water is becoming a superceding concern and where a few of the old growth forests remain, it must compromise? Can it understand that substituting thinning for clear cutting although it will satisfy neither the timber industry nor the no-clear-cut proponents is an alternative worth pursuing if the Board wishes to wean itself from the addiction to clear cutting?

Submitted by,

Bhagwati P. Poddar, Ph.D.



COMMENTS

Board of Forestry Work Plans

The County Commissioners have taken a comprehensive, multi-resource approach to the management of the State Forest over the years. That is why so much work was put in to the State Forest Management Plan.

Most of the land that makes up the Tillamook Forest was from county foreclosed tax-delinquent lands. The land was felt to have little value after a series of wildfires.

An agreement was made to have the Department of Forestry to replant the Tillamook burn and the counties would pay off the reforestation costs as the timber was harvested. This trust agreement allowed the State Forestry to manage county lands with the understanding that a certain portion of the monies was to return to the counties from the management of the timber. This trust agreement has been upheld in court.

County officials worked with Oregon Governor Charlie Sprague and the 1939 legislature to create our present state forest.

The County Commissioners entered into an agreement in 1939. The counties could deed lands to the state that among other things, "Are chiefly value for the production of forest crops". This is the law that governs the Trust Lands of today. History tells us the 15 counties would have never deeded their lands without the Trust Agreement.

This Agreement was upheld by two Court decisions clearly stated the trust lands were intended to be revenue producing lands.

Adaptive management is well defined as a scientifically based, comprehensively structured approach that learns from actions. Adaptive management improves management by accommodating change through * problem assessment * monitoring * evaluation * adjustment. Adaptive management concept understands that mistakes will be made yet we will learn and improve our forest health.

The history of the Tillamook Burn should always be etched in the minds of Oregonians. Oregon's State Forest Management Plan (January 2001) has a principle built into it, that Healthy Forests are more resistant to *fire*. Healthy forests will always be important to the people of Oregon.



Land of Cheese, Trees and Ocean Breeze

The planning effort included input from all segments of our population. This is a thoughtful forest management plan that to ensure predictable timber and revenues for our schools and local economies, diverse habitats for wildlife and fish and recreational opportunities.

In documented reports, it is estimated that for each one million board feet of timber harvested, the forest generates 24 jobs. The 24 jobs equate to \$1,200,000 in personal income for Oregonians. That's jobs for the people and taxes for Oregon.

Conclusion; the board must include (trust county) people into the balance of the forest management. You are charged with insuring historical agreements, wildfire protection, school lands management and trust agreements.

A handwritten signature in black ink, reading "Charles J. Hurliman". The signature is fluid and cursive.

Charles J. Hurliman
Tillamook County Commissioner

-----Original Message-----

From: KRUNGLEVICH Matthew
Sent: Tuesday, June 05, 2007 11:27 AM
To: BOF Issues Manager
Subject: 2007 BOF Issue Suggestions

Suggested Issues for
the Board of Forestry to consider in 2006

First Name: Matthew
Last Name: Krunglevich
Email: MKrunglevich@odf.state.or.us
Address1: 5286 Table Rock Rd.
City: Central Point
State: OR
Zip: 97502
Company: Oregon Department of Forestry
Title: Protection Planner
Phone: 5416643328
Contact by: E-Mail

Issue Description: I am interested in seeing forest fragmentation addressed. More landowners are purchasing rural lands and not addressing common forest management problems. Education and outreach needs to be discussed and the loss of timber that results in lower volumes that are produced. It seems land management usually falls behind with small landowners. They don't have the means or knowledge to keep their forest healthy and productive. They also tend not to manage for the long run because they feel they will never see the results. Generally these landowners don't have objectives of future timber harvests.

Energy Trust of Oregon is an independent non-profit organization managing a trust fund on behalf of the State. The money comes from a public-purpose charge on the electricity bills of customers of PGE and Pacific Power. We use some of those funds to support the development of renewable energy projects. In particular, our Biopower program (<http://www.energytrust.org/RR/bio/index.html>) seeks projects that generate power from clean organic wastes (i.e., "biomass") such as wood, sewage treatment gas, and dairy manure.

Our 2005 market assessment of available biomass in Oregon suggested that Oregon's largest potential biomass energy resource is wood from forest thinning and other stewardship activities. That report also declared that the resource was, for the time being, off limits, due to undeveloped legal and market infrastructure (as well as uncertainty over rights to the water necessary to build biomass power plants).

Since 2005, the situation has evolved. Energy Trust has made a financial commitment to two mill-based biomass cogeneration projects which plan to source part of their fuel from stewardship activities: one at Rough & Ready Lumber in Cave Junction, and one at Warm Springs Forest Products Industries. We believe that these are strong projects with strong partners.

Nevertheless, it is not clear whether forest biomass is a viable, long-term energy resource. The projects mentioned above may be special cases, adding value to the local community but ultimately not replicable. Or, they may be pioneers, demonstrating a new synergy between sustainable energy and sustainable forestry, with significance for the entire state. It's not clear which.

For forest biomass to become a significant energy resource – and for renewable energy to become a significant source of revenue for forest management – we see three challenges.

First, the science: We need to understand the conditions under which forest biomass can be used as an energy resource while adding value to environmentally sound forest management that restores forest health, without adding an industrial stress to sensitive ecosystems.

Second, the public support: Oregon needs to build a critical mass of credible stakeholders who support a linkage between energy and forestry, and individual projects need community buy-in. Without community support, any energy project can be delayed and derailed.

Third, the business fundamentals: For an energy project to attract financing, it needs a robust fuel supply plan. Our experience is that a project should have at least ten years of fuel under control or contract, plus a plausible plan for securing fuel in the eleventh year and beyond. Moreover, because the energy project will have an obligation to deliver its electric output to the power purchaser and remedies for non-performance, the obligations in the fuel supply contracts must be secured, with comparable remedies. Otherwise,

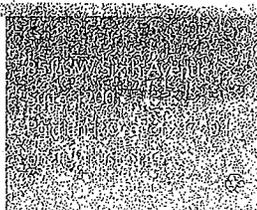
supply disruptions could quickly drive the project into bankruptcy. Few lenders would accept that risk.

Energy Trust of Oregon focuses on energy, not forestry. We defer to the forestry community to decide whether renewable energy makes sense as part of Oregon's forestry vision. We look forward to The Board of Forestry's engagement in these issues.

Adam Serchuk, Ph.D.
Senior Program Manager
Renewable Energy

EnergyTrust
of Oregon, Inc.

1-866-ENTRUST
503 445-7632 direct
503 546-6862 fax
adam.serchuk@energytrust.org



Board of Forestry - 2007 Issue Scan

Printed Name: Sam Brentano
 Affiliation: Marion County Board
 Mailing Address: PO Box 14500
Salem, OR 97309

Please describe the proposed issue [in 500 words or less]:

*Cut the timber! Replant the trees
 and then do it over again. Like
 you are supposed to do.*

Samuel A. Brentano



Board of Commissioners

Marion County

OREGON

Sam Brentano
Commissioner

(503) 588-5212
Fax (503) 588-5237

Courthouse Square • 555 Court St. N.E.
P.O. Box 14500 • Salem, OR 97309-5036
E-mail: sabrentano@co.marion.or.us

Return to: Oregon Department of Forestry
 Attn: Dan Postrel, Agency Affairs
 2600 State Street, Building B
 Salem, OR 97310

before July 31, 2007

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Board of Forestry - 2007 Issue Scan

Printed Name: JOE STORCKBURG
 Affiliation: _____
 Mailing Address: 806 9TH AVE.
COSBY, OR 97420

Please describe the proposed issue (in 500 words or less):

EDUCATE THE PUBLIC ABOUT THE LAWS GOVERNING
ALL ACTIVITIES INVOLVED IN FOREST MANAGEMENT.
(HARVESTING, REGENERATION ETC.). I FEEL THAT
FEW PEOPLE OUTSIDE THE TIMBER INDUSTRY
HAVE AN UNDERSTANDING OF HOW
THROUGHLY FORESTRY ACTIVITIES ARE
REGULATED.

Return to: Oregon Department of Forestry
 Attn: Dan Postrel, Agency Affairs
 2600 State Street, Building B
 Salem, OR 97310

before July 31, 2007

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Board of Forestry - 2007 Issue Scan

Printed Name: Scott R. Cooper
Affiliation: Crook County Judge
Mailing Address: 300 NE Third St., Prineville OR 97754

Please describe the proposed issue [in 500 words or less]:

Invest in updating on-line information about Forest management. ODF's data was once the best resource for state and county-level data about ~~Forest~~ harvest levels on Federal, state and private ground. Now, the web site lacks statistical information and substitutes self promotion. Let the data speak for themselves. Put the numbers back on line.

Return to: Oregon Department of Forestry
Attn: Dan Postrel, Agency Affairs
2600 State Street, Building B
Salem, OR 97310

before July 31, 2007

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June 26, 2007

Oregon Department of Forestry
Mr. Dan Postrel, Agency Affairs
2600 State Street, Building B
Salem, Oregon 97310

Re: Board of Forestry-2007 Issue Scan

Dear Mr. Postrel:

Thank you for taking our comments regarding the Forestry Program for Oregon. The American Forest Resource Council (AFRC) represents over 80 forest product businesses and forest landowners in western United States. Our mission is to create a favorable operating environment for the forest products industry, ensure a reliable timber supply from public and private lands, and promote sustainable management of forests by improving laws, regulations, policies and decisions that determine or influence the management of all lands. I will provide comments regarding two issues that our membership believes are critically important; 1) State Forests Management and 2) Improved management on the federal lands within Oregon.

State Forests Management

FD 15 Oregon's State Forests should be managed with a stronger emphasis on active management to produce higher sustainable annual timber harvest levels, and there should be less focus on structured based management plans that overemphasize wildlife protection. The forest products sector is Oregon's second leading industry and employer. The economic activity generated by our industry is critical to local and state governments. With this in mind AFRC strongly believes that current measures imposed on state forest management, such as the HCP for the Elliott State Forest, should be updated to reflect the latest science regarding threatened and endangered species, while also factoring in the potential impacts of climate change. For example, the draft Spotted Owl Recovery Plan has found that habitat is not the limiting factor, but that the Barred owl and catastrophic wildfire the the most pressing risk. Hence, setting aside large blocks of lands for their protection on state forest lands is unjustified. The structure based management regime which sets large areas aside for management of this and other species is simply not needed. Oregon's state forests need a more dynamic management strategy which allows for flexibility in managing forests, wildlife, and water needs. Finally, our nation is importing nearly 40 percent of the lumber we use for housing and other uses from other countries, most of which is imported from Canada. The Tillamook, Clatsop, Santiam, Elliott, and Sun State forests are being managed significantly under their sustainable potential, and it is time that we better manage our forests to provide the raw materials that our citizens need and use.

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10 16

Federal Forest Management Issues

The Board of Forestry needs to take a more active role in influencing how the federal forest lands in Oregon are managed since they make up 57 percent of Oregon's total forested land base. Past decades of little or no management on these lands have left them overstocked with vegetation and plagued by insects and disease outbreaks. Unfortunately the wildfires and epidemics that begin on these lands don't stop at property boundaries, placing at risk Oregon's State and private forests. The Board should actively support full implementation of the Northwest Forest Plan and insist that the drier site National Forest and BLM lands be thinned to reduce the risk of catastrophic wildfires and insect and disease infestations.

Thank you for taking our comments regarding the **Forestry Program for Oregon**, and our organization would like to be an active partner in the development of future management strategies impacting Oregon's forested landscape.

Sincerely,

Tom Partin

Tom Partin
President

Board of Forestry - 2007 Issue Scan

Printed Name: Ed Livingston
Affiliation: Committee for Family Forests
Mailing Address: 57250 Gerber Rd., Bonanza, OR 97623

Please describe the proposed issue (in 500 words or less):

ODF SLUSH FUND DEDICATED TO FORESTLAND PURCHASE

PRESCRIBED FIRE & LANDOWNER LIABILITY

ODF ENHANCED P.R. PROGRAM STATEWIDE

17 INDICATOR SPECIES SCIENCE / LANDOWNER FINANCIAL IMPACT
PRESCRIBED FIRE PROGRAM

17 INCENTIVES VS. REGULATION

A BRIDGE BETWEEN THE LEGISLATURE & ODF

17 ENHANCE SERVICE FORESTRY

ODF LOCAL P.R. WHO KNOWS WHAT KFFA MEANS?

FIRE! HOW CAN WE PAY FOR IT?

17 IS THERE A POTENTIAL SEEDLING (NURSERY) PROBLEM?

Return to: Oregon Department of Forestry
Attn: Dan Postrel, Agency Affairs
2600 State Street, Building B
Salem, OR 97310

before July 31, 2007

From: nancyn@efn.org [mailto:nancyn@efn.org]
Sent: Tuesday, June 26, 2007 6:41 PM
To: BOF Issues Manager
Subject: 2007 BOF Issue Suggestions

Suggested Issues for
the Board of Forestry to consider in 2006

First Name: Nancy
Last Name: Nichols
Email: nancyn@efn.org
Address1: 93849 Deadwood Creek Road
City: Deadwood
State: OR
Zip: 97430
Company:
Title:
Phone: 541-964-3020
Contact by: E-Mail
Issue Description: The board needs to expedite the rule making process to modify OAR 629-623-0500 & 550 so that the regulations result in practices that reduce the risk to people living in high landslide hazard areas.

FD 18 Many people living in homes built on alluvial fans do not realize how risky their situation is. Compounding the problem, they believe they would automatically be notified of any logging on neighboring property that would affect them. The risk for damage and death is likely to get much worse as homes are build on thousands of acres opened up to development by measure 37 claims. If projections for heavier winter rains in the Pacific Northwest over the next 50 years are correct, another layer of risk will be added. This is an important issue that needs attention now.

Id 19 Notification to owners of at-risk dwellings should be automatic and the process to allow a stay of a logging operation so that stability can be truly determined should be easy and inexpensive.

As this addresses human health and safety, this would not be affected by Measure 37 claims from those who may have to modify logging practices to assure the safety of those living in homes or driving along roads below their land.

Board of Forestry - 2007 Issue Scan

Printed Name: Ed Livingston
Affiliation: Committee for Family Forests
Mailing Address: 57250 Gerber Rd., Bonanza, OR 97623

- ID 20 Please describe the proposed issue (in 500 words or less):
ODF SLUSH FUND DEDICATED TO FORESTLAND PURCHASE
PRESCRIBED FIRE & LANDOWNER LIABILITY
ODF ENHANCED P.R. PROGRAM STATEWIDE
- ID 21 INDICATOR SPECIES SCIENCE / LANDOWNER FINANCIAL IMPACT
PRESCRIBED FIRE PROGRAM
INCENTIVES VS. REGULATION
A BRIDGE BETWEEN THE LEGISLATURE & ODF
ENHANCE SERVICE FORESTRY
- ID 22 ODF LOCAL P.R. WHO KNOWS WHAT KFPA MEANS?
FIRE! HOW CAN WE PAY FOR IT?
IS THERE A POTENTIAL SEEDLING (NURSERY) PROBLEM?

Return to: Oregon Department of Forestry
Attn: Dan Postrel, Agency Affairs
2600 State Street, Building B
Salem, OR 97310

before July 31, 2007

Suggested Issues for
the Board of Forestry to consider in 2006

First Name: Thomas
Last Name: Steinberg
Email: thstein@efn.org
Address1: 1830 Washington Street
City: Eugene
State: OR
Zip: 97401
Company:
Title:
Phone: 541-485-6471
Contact by: Postal Mail
Issue Description: I submitted my concerns about landslide
risk and threats to homes and lives in the 2005-06 Issue
scan. Please revisit my submission (including photos) on
pages 53-57 at
<http://www.oregon.gov/ODF/BOARD/docs/issues.pdf>

This is still an important issue that needs to be
addressed.

*Following
(pages)*

Use this form to suggest issues for the Board of Forestry to consider as it shapes its 2006 work priorities. Return by 5 p.m., August 5, 2005, to Oregon Department of Forestry, Board Support, 2600 State Street, Bldg. B, Salem, Oregon 97310.

2006

Printed name Tom Steinberg

Affiliation 18315 Washington St Eugene, OR 97401

Mailing address, City, State, Zip

Phone number and/or e-mail address 541-485-6471 tom.steinberg@murtrogen.com

Preferred method of contact: mail e-mail phone

Please provide a brief description of the proposed issue [500 words or less]

See attached testimony given to Paul Holvey at town hall meeting (March 2005) & response from Larry Quackenbush

We recently learned that people who own homes at high risk of being crushed by landslides have no rights to protect their homes and their lives if they fail to comment in writing on a the logging plan. Most people do not know that a neighbor is planning to log above their home until the trees start to fall. We believe that several legislative changes are needed.

People with homes at the base of high-risk hillsides and draws should be automatically notified of logging plans so they can comment.

The "at risk" area from the mouth of the draw (where the state takes a thorough look) should be increased from 200' to 400'. I have a photo here showing me standing a little over 200' from the mouth of the draw on one of the many 1996 coast range landslides. That landslide traveled about 400' This photo does not show the whole landslide but gives you a good idea that people in a house 300 feet from the mouth of a draw could easily be killed.

If the timber company does not even mention in their plan that there is a house in a high-risk area, the owner of the house should be able to get a stay of the logging as soon as he finds out about the plan.

The amount of deposit need to obtain a stay in this situation should be \$500, not \$15,000.

Oregon Department of Forestry should tell anyone who comments orally that only written reports create "standing." Even if someone has personally met with the ODF service forester and gone over all his or her concerns, she or she has no standing even though his or her life and/or property is at risk if no written comment is sent in. Alternately an oral comment to a service forester should count.

The fine for a life-threatening violation of the forest practices law should be \$100,000 or more, not \$5,000.

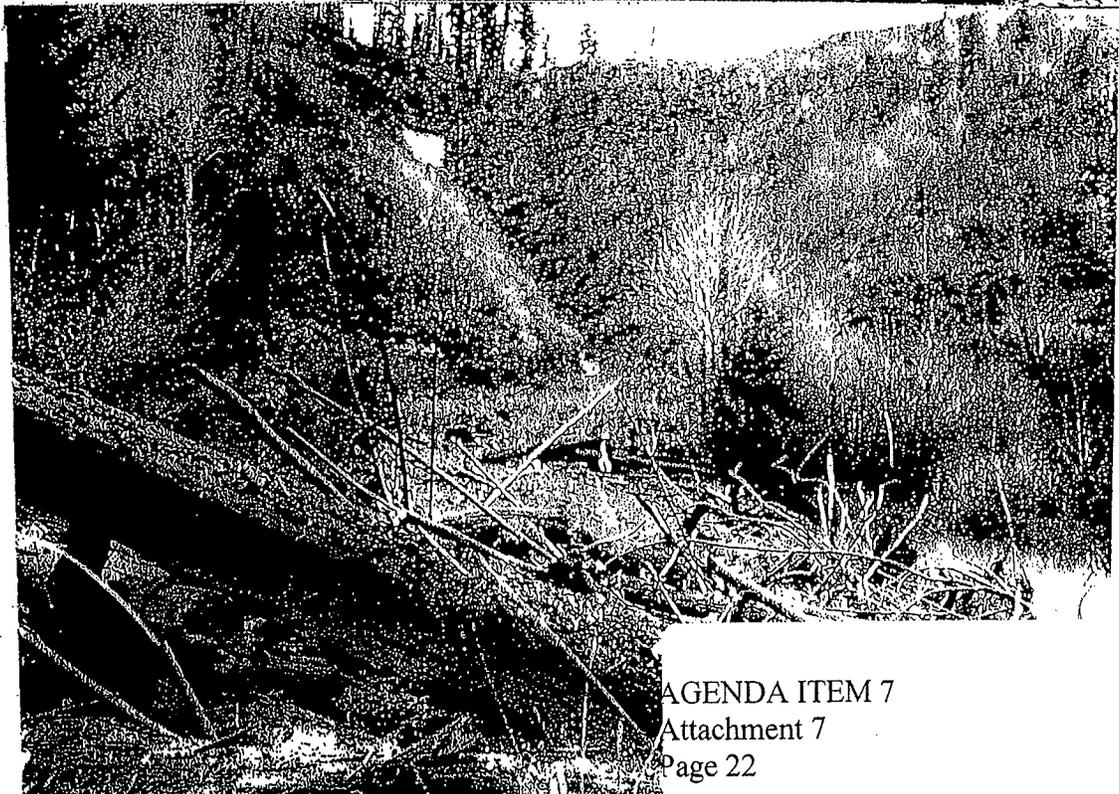
For non life-threatening violations, the potential fine should be up to 3 times the value of the trees taken illegally. This would limit the temptation to take extra trees knowing the worst possible fine is less than the value of the logs.

Photo
mentioned
in testimony



Same
slide,
from
further
back-

Note figure
in blue jacket





Oregon

Theodore R. Kulongoski, Governor

July 21, 2005

Tom Steinberg
1830 Washington Street
Eugene, Oregon 97401

Nancy Nichols
93849 Deadwood Creek Road
Deadwood, Oregon 97430

Department of Forestry

State Forester's Office

2600 State Street

Salem, OR 97310

503-945-7200

FAX 503-945-7212

TTY 503-945-7213 / 800-437-4490

<http://www.odf.state.or.us>



STEWARDSHIP IN FORESTRY

Dear Mr. Steinberg and Mrs. Nichols:

Earlier this year you contacted Representative Holvey's office regarding your concerns about forest operations and landslides in the coast range. Representative Holvey met with members of our leadership and asked the Department to follow up with you.

In my conversations with Nancy several months ago we focused on the requirement to "give an undertaking . . . [which] shall not be less than \$15,000." To change this amount would require legislative action, and you have contacted your elected representatives with a suggestion for a greatly reduced deposit in certain situations.

In reading the comments made at the Veneta town hall meeting, you also suggested "[p]eople with homes at the base of high risk hillsides and draws should be automatically notified of logging plans so they can comment. I do not know whether any consideration was given to including a requirement like this in the high landslide hazard administrative rules when they were developed several years ago. I do know we plan to examine these rules over the course of the next year, and consider proposing changes to the Board of Forestry. I will make sure those engaged in that effort are aware of your suggestions.

In addition, state law (ORS 183.390) expressly guarantees an interested person may petition an agency requesting the promulgation, amendment, or repeal of a rule. I encourage you to bring this issue either as a formal petition or simply by expressing your ideas as a concerned citizen to the Board of Forestry. As I was requesting your mailing addresses, it also occurred to me that it would be timely for you to make this request directly to the Board of Forestry because they are currently soliciting issues of concern from anyone interested in forestry. Nancy was familiar with the Board's request and I encourage you to propose this issue so that it can be considered in their work plan for next year.

In regard to your specific concerns with the harvest adjacent to your property, our "geotech" has indicated the landowner proposing or conducting the forest practice hired a well regarded consulting geotech to review the possible risk to the A-frame. Their analysis concluded the impact rating was unlikely, and therefore the risk to the A-frame is low. Our specialist after reviewing the report and visiting the site believes that conclusion is reasonable. The A-frame sits across the floodplain of Panther Creek, opposite and offset from the mouth of the small canyon which drains the operation. I also understand the report explains how the basin differs from the basin above your own property.

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As I understand, your experience with a coast range landslide traveling more than 200 feet refers to an area logged prior to 1996 which failed (presumably) in the severe storms of November 1996. I don't believe that basin is within the currently proposed operation. I understand from our specialists that had that harvest occurred after the current rules were adopted, the analysis and review now required, would likely have led to a modification or prohibition of the operation. Our specialists, as licensed professionals, are among the most knowledgeable in the state regarding these shallow rapid landslides and place public safety above any other considerations when reviewing proposed operations where there is a question of landslide hazard.

One of the criteria, among several, the Department's "Tech Note 2" suggests for determining the extent of the further review area, is if a structure is within 200 feet of the loss of confinement. "Tech Note 2" also notes that evidence of past debris flows may take precedence over the distances used for initial screening. Our specialists do not limit their evaluation to the 200 feet distance if evidence suggests a need to review areas beyond that guideline. The consultant also based their conclusions on geomorphic circumstances and did not simply rely on the distance exceeding the 200 foot criteria.

According to the District, the required written plan addressing this issue as well as others has been completed and determined to be acceptable.

Your suggestions for increasing penalties for life threatening violation of the Forest Practices Act, like the change in deposit for requesting a stay of operations would require action by the legislature. Again, I encourage you to make these concerns and ideas known to the Board of Forestry and we welcome your input as we begin developing our proposals as well.

Sincerely,



Lanny Quackenbush
Operations Unit Manager
Oregon Department of Forestry

- C: Rick Rogers, West Lane District
- Paul Bell, Program Director, Private & Community Forests
- Ted Lorensen, Assistant State Forester
- Representative Paul Holvey

First Name: Lona Pierce
Email: alkpierce@colcenter.org
Address1: 56498 Crest Drive
City: Warren OR 07053

Phone: 503-397-5739
Contact by: E-Mail

Issue Description: Private Lands: The Board of Forestry could do a better job of getting the word out that snags should not be cut down to "clean up" woodlands. Often within a few years after logging and replanting, the land is sold. New owners promptly cut snags that were left as required by state law. Anyone buying woodlands should be aware that snags should be left standing. New woodland owners also tear out native riparian shrubs to "clear out" brush. This destroys shade and wildlife habitat. Long-term management rules, not just enforcement during actual logging, could help maintain pockets of diverse woodlands. State Forests: sections of state-owned forest should be managed to sustain a full representation of native flora in all stages of maturity. Managing primarily to sustain logging results in extirpation of many forest wildflowers and other species that require undisturbed soil or shade. Sustaining many birds and wildlife species will be impossible, as well, without widespread plant diversity.

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Loss of botanical diversity is particularly severe in the northwest region of the state. Columbia County plants such as tiger lilies, calypso orchids, and other once common forest plants only survive in a few scattered small populations. For some species, they are down to a single identified population. Even plants like devil's club are rarely encountered over tens of thousands of acres. The absence of important and once-common native plants is not a sign of sustained forestry. More than buffers along streams are required to sustain viable populations of plant species.

The Tillamook and Clatsop state forests can provide blocks where historic mature forests are restored to assure that a wide variety of plant species survive in the northwest region of the state. Thin the vast solid stands of Douglas fir by helicopter, then replant with cedar, grand fir, hemlock, and other appropriate native forest trees, considering the location. The small sections of state forest in Columbia County are treated as tree farms rather than forests. State lands could help restore forest diversity here where surrounded by nothing but tree farms.

Lastly: When Douglas fir is planted on state-owned lands anywhere, WILD-TYPE SEEDLINGS are preferred, since "genetically improved" stock have much weaker wood. These cultivated types may be appropriate for tree farms where a rapid turnover is desirable, but not on forestlands where a sustained diverse forest and genetic variation should have higher priority.

ID 25

From: nancyn@efn.org [mailto:nancyn@efn.org]
Sent: Tuesday, June 26, 2007 6:41 PM
To: BOF Issues Manager
Subject: 2007 BOF Issue Suggestions

Suggested Issues for
the Board of Forestry to consider in 2006

First Name: Nancy
Last Name: Nichols
Email: nancyn@efn.org
Address1: 93849 Deadwood Creek Road
City: Deadwood
State: OR
Zip: 97430
Company:
Title:
Phone: 541-964-3020
Contact by: E-Mail

Issue Description: The board needs to expedite the rule making process to modify OAR 629-623-0500 & 550 so that the regulations result in practices that reduce the risk to people living in high landslide hazard areas.

Many people living in homes built on alluvial fans do not realize how risky their situation is. Compounding the problem, they believe they would automatically be notified of any logging on neighboring property that would affect them. The risk for damage and death is likely to get much worse as homes are build on thousands of acres opened up to development by measure 37 claims. If projections for heavier winter rains in the Pacific Northwest over the next 50 years are correct, another layer of risk will be added. This is an important issue that needs attention now.

Notification to owners of at-risk dwellings should be automatic and the process to allow a stay of a logging operation so that stability can be truly determined should be easy and inexpensive.

As this addresses human health and safety, this would not be affected by Measure 37 claims from those who may have to modify logging practices to assure the safety of those living in homes or driving along roads below their land.

First Name: Bill
Last Name: Kluting
Email: billkluting@hotmail.com
Address1: 6600 Cooper Hollow
City: Monmouth
State: Or
Zip: 97361
Company:
Title:
Phone: 503-623-4012
Contact by: E-Mail

Issue Description:

If the allowable sustainable was achieved just on the Tillamook and Elliott Forests we are looking at at least a \$30 million increase in state revenues and creating an additional small number of family wage jobs helping our rural areas

First Name: Joel
Last Name: Robe
Email: joel.robe@comcast.net
Address1: 3834 Robbie St
City: Eugene
State: OR
Zip: 97404
Company:
Title:
Phone: 541-461-2273
Contact by: E-Mail

Issue Description: I am writing in support of keeping pesticides from near schools that are adjacent to forest lands. I understand that at times there may be a need for pesticides, but that there never should be a situation where they are used with any likelihood of impacting students and staff in schools. I would ask that you review alternatives and ensure a safe use of any pesticides.

I would also suggest that the use of pesticides around any water ensure that the pesticides do not get into the groundwater or streams and rivers where they can impact humans and wildlife.

Thank you.

Joel Robe

First Name: Doug
Last Name: Heiken
Email: dh@oregonwild.org
Address1: PO Box 11648
City: Eugene
State: OR
Zip: 97440
Company: Oregon Wild, formerly Oregon Natural
Resources Council
Title: Conservation and Restoration Coordinator
Phone: 541-344-0675
Contact by: E-Mail

Issue Description:

The Board of Forestry should update the economic framework and assumptions that it operates under. The board's blatant bias in favor of logging is premised on an outmoded understanding of economics. The board's "economic base" model relies on assumptions that do not hold up in the real world. The "economic base" model cannot explain the fact that Oregon's economy boomed while federal timber supply declined in the 1990's. The economic reality that the board should operate under is based on healthy forest ecosystems as quality-of-life assets that attract diverse workers and employers. Economic diversity, rather than resource extraction, should be the primary goal of Oregon's economic development strategy. Adopting a more accurate and updated economic framework would help reorient the Board's activities to de-emphasize active management except where it is needed for forest restoration.

First Name: Barbee
Last Name: Bird
Email: barbee.bird@hp.com
Address1: 15531 Lobster Valley Rd
City: Alsea
State: OR
Zip: 97324
Company:
Title:
Phone: 541-908-2825
Contact by: E-Mail

Issue Description:

I am concerned about the priority given to chemical monitoring of applied herbicides. I have lived adjacent to public and private forestland in lobster valley for many years, and have seen trees on my property die right after herbicide application on the hill behind us. The spring that provides water to our house and my mother's house is on the forestland behind us, and we have a registered permit to use it. Lobster creek runs through the middle of our property and is the spawning ground for coho salmon. My husband and I have never used any herbicide on our garden, our fruit trees, our pasture, or our reforested acres in the 34 years that we have lived there. As a resident of the richest country in the world, it is my expectation that no water source should be compromised by herbicide residue. It's inexcusable. I would like to see that we do everything we can to make clean water and clean air our top priority. We should expect that monitoring the application of potentially harmful herbicides or pesticides in the place where we live is stringent enough to guarantee the integrity of those resources. If we screw that up, nothing else matters. We have many neighbors who share that value.

Suggested Issues for
the Board of Forestry to consider in 2006

First Name: peg
Last Name: reagan
Email: info@conservationleaders.org
Address1: 97305 Signal Butte Trail
City: Goild Beach
State: OR
Zip: 97444
Company:
Title:
Phone: 541 425-0435
Contact by: Postal Mail
Issue Description: RE: herbicides

I urge ODF to give high priority to Chemical Monitoring of herbicides in state forests. While I do not live near the state forests, I do live near other public and industrial forests and have had years of experience dealing with aerial spraying.

You put the public's health at risk when you spray as well as the survival of fish and wildlife.

While I would like you to NOT use herbicides on state forests, I know you will. The least you can do it make monitoring of that use a high priority.

Suggested Issues for
the Board of Forestry to consider in 2006

First Name: Susanna
Last Name: DeFazio
Email: susiklare@yahoo.com
Address1: 87805 Walker Creek Road
City: Walton
State: OR
Zip: 97490
Company:
Title:
Phone: 541-935-7604
Contact by: E-Mail

Issue Description:

I'm a small timber property owner (58 acres) surrounded by large timber owners, state, and federal lands in the coast range. Our domestic water supply is from a stream. My biggest concern is use of chemicals in forestry practices and their potential damaging effects on our water, my and my family's health, and the health of wildlife and forest ecosystems.

I ask ODF to increase representation of those with environmental and health concerns and to increase monitoring of chemicals in streams and the water table. I'm worried that financial stakeholders (timber producers and chemical manufacturers) have a bigger voice at the table than those of us who must live with the consequences of their choices. I'm concerned about drift and ask for increased monitoring regarding the effects of chemical drift.

Have any studies ever been done on the long term effects of pesticides on mycorrhizal systems? If anyone in your department can answer this particular question, please email or call me at 541-935-7604.

First Name: Jerome
 Last Name: Kimmel
 Email: jerry@yachatsriver.com
 Address1: 5744 Yachats River Road
 City: Yachats
 State: OR
 Zip: 97498
 Company: Garden Variety
 Title:
 Phone: 541-547-4647
 Contact by: E-Mail

Issue Description:

forestry herbicides should not be used until the DOF is satisfied that the best available science to guide policies which direct the aerial applications of herbicides indicates the safety of the procedure and the lack of harm to wildlife and fish. we live next to an area which would be sprayed and feel that the long term damage to us has not been evaluated

thank you

PO Box 1954
Newport, Oregon 97365
Melinda_mccomb@yahoo.com
July 12, 2007

ATTN: Dan Postrel, Agency Affairs
Oregon Dept. of Forestry
2600 State St., Building B
Salem, Oregon 97310

RE: PUBLIC COMMENT ON AERIAL SPRAYING BY TIMBER INDUSTRY

Dear Mr. Postrel:

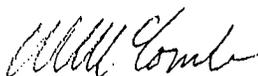
Please enter the following comments in the public record for the current ODF review of issues related to aerial pesticide/herbicide spraying by the timber industry on private lands:

I would like to convey to the Oregon Department of Forestry my **STRONG OBJECTION** to the continued permitting of aerial spraying of herbicides on private forestlands. There are numerous excellent recent studies on the impacts of pesticides on human and environmental health and I believe these known widespread human and environmental health impacts should be given priority over the benefits of weed control for the sole benefit of private industry. Quite simply, it is now known that most members of the public carry, unwillingly, body burdens of industrial pesticides, and that these body burdens have known health impacts on members of the public via air, soil and water contamination, and to knowingly allow continued poisoning of human populations for weed control is nothing less than criminal negligence on the part of a public agency.

To continue pretending that nothing new has been learned since aerial spraying began in the late 1940's is absurd, yet ODF continues to ignore mounting world-wide well-documented and unbiased studies showing the drift of pesticide vapors over long distances, the widespread contamination of public waterways with pesticides, the known human body burdens and health links between serious health ailments such as breast cancer, Parkinson's disease, and increased chemical sensitivities in Oregon residents, the economic impacts in everything from contamination of organic crops to health care costs, and the higher risk for health impacts related to pesticides upon children. Many things accepted out of ignorance fifty years ago would be unthinkable today; remember above ground nuclear testing in Nevada? Remember that African Americans were required to use separate public facilities? The failure of ODF to acknowledge such basic scientific principles such as the earth's hydrologic cycle- yes the waters of the earth are all one, as is the air (there is no "private" water, air or soil), in the 21st century is so far outside current science and medical knowledge that the continued poisoning and defilement of the common elements necessary for human and environmental health and survival can only be due to extreme incompetence, blatant corruption via special interest groups, or simply insanity; ignorance is no longer an excuse.

ODF continues to prioritize weed control over human health? I object to your priorities. I object to my body being poisoned without my consent. I object to being forced to breathe and drink industrial chemicals designed for warfare, whose active ingredients are not tested prior to widespread use for human and environmental health impacts, and whose "inert" ingredients are trade secrets. I object to the corruption of government agencies whose policies favor private industrial profit over public health. I object to ODF's dismissal of my rights as a "stakeholder" in the public commons. I object to ODF's lack of foresight and compassion in allowing substances that mutate DNA and reproductive functions and cause unnecessary disease and misery in the exquisitely designed life forms of our interdependent biosphere that have evolved over eons. I object to the waging of chemical warfare on all the earth's life forms... for weed control! Putting anything into the air we all breathe is not a "private" property right.

Melinda McComb



AGENDA ITEM 7
Attachment 7
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James F. Moore Jr.
1217 Park St.
Ashland, OR 97520
541-482-8151
jmoore@jeffnet.org

Pisces Ergo Sum

ODF

7/11/07

Dan Postra/Agency Affairs
2600 State St. Bldg. B
Salem, OR 97310

Re: Use of Herbicides and Pesticides in Forestry Management

While not an expert in Forest Management, I hold an MS in the field of Science and have spent much time on the problems related to the impacts of human related Forestry Management problems.

In reviewing the 2007 Board of Forestry Plan and the comments related to the conflict between science in natural resource management and policy making; I was struck by the apparent reluctance by some to utilize science in making sound management decisions. It appears that the "we've always done it that way" syndrome and past customs have a higher priority than science as used by System Evidence Review protocol. While science, by itself, is not the whole answer, it must be the "driver" in reaching good policy making decisions.

Our forest management history is strewn with examples of decisions made with little regard for what science suggested. A classic example is Nancy Langston's 1995 book "Forest Dreams, Forest Nightmares" the paradox of old growth in the Inland West. We cannot afford to continue to making decisions of this nature.

In setting policy regarding the use of pesticides and herbicides it would seem that past history would suggest "none or as little as possible" would be the major rule. As we become better educated as

to what effects our actions cause on our ecology we appear to encounter more and more adverse effects that we don't understand. Example are numerous; but to list a few:

Unknown health effects on the general population:

- o increase in asthma and related respiratory diseases
- o increase in such genetic diseases such as autism

While none of these may be related to pesticides/herbicides; we don't know.

Unknown impact on other species such as anadromous fish populations and their food sources.

Impact on economy such as growing organic farming industry.

If we must utilize herbicides and pesticides it should be the last action and then it must be only used with a high priority to chemical monitoring and under strict regulations by highly trained personnel.

Thank you for giving me the opportunity to comment on this subject.


James F. Moore Jr.

July 12, 2007

Board of Forestry 2007 Issue Scan

Printed Name: Gary Springer
Affiliation: Starker Forests, Inc
Mailing Address: PO Box 809
 Corvallis, OR 97339

My issue for Board consideration – Moving Forward

I have a different kind of issue for consideration this year. With the eight work plans currently in play it is clear that the Board has its plate full. So my first recommendation is to not pile on any more issues, or new work plans!

My second suggestion along the same lines would be for the Board to carefully prioritize issues needing the greatest attention within* each work plan and between** work plans and then focus immediate work on those items of highest priority. I think the way to start would be to take a realistic look at resources – Board and staff time availability, budget limitations, and stakeholder/partner group limitations. That might help focus priorities.

Finally, I think a couple of changes are needed to help the Board move forward on complex and contentious issues. Department staff has been very good at developing and presenting a wide range of options for the Board to consider on any particular issue, but has been careful not to recommend the option(s) it thinks would be the best choice. The Board would make better use of its professional resources within the Department and improve its decision-making if it asked for recommendations from staff.

Also, in order to save the Board's very important consensus decision-making process it would be good to recognize its limitations and realize that you can't always get from point A to point B by consensus. I think there are times when the Board needs to move forward and only a Board vote on an issue can break the deadlock. The Board may be at that point on State Forest management.

* Example: Within the Forest Regulation work plan I would give the highest priority to maintaining strong monitoring and forest practices research programs to evaluate rule compliance and effectiveness of current rules and to help improve future rule change.

**Example: Among the Board's eight work plans, highest priority must be given to the "non-discretionary three"- Wildfire Risk Management, State Forests Management, Forest Regulation. I would put the remaining work plans in the following order- Forest Vitality, Dynamic Ecosystems (which could be folded into Forest Regulation), Outreach to Urban Populations, Invasive Species. The eighth work plan is Implementation of the FPFQ, which is certainly important, but I think that is a given if the other work plans are executed well!

First Name: Andrew
Last Name: Orahoske
Email: ecolaw@gmail.com
Address1: 2000 Missoula Ave
City: Missoula
State: MT
Zip: 59802
Company:
Title:
Phone: 541-359-9805
Contact by: E-Mail

Issue Description:

I urge the Board to ban the use of forestry herbicides within 300 feet of streams and rivers. The buffers and labels provided by EPA are not sufficient to protect salmon and steelhead, as was the conclusion of District Judge Coughenour, of the W.D. Washington. The judge's order enjoined the application of herbicides near streams even though EPA and the states allowed it. This shows that the EPA and the state cannot be relied upon to effectively protect water quality. Therefore, the ODF should take a precautionary approach and require that any herbicide application on forestry lands must be at least 300 feet away from streams.

First Name: Karl
Last Name: Johnson
Email: johnsonkfj@earthlink.net
Address1: 67440 Trout Lane
City: Bend
State: OR.
Zip: 97701
Company: K.F.J. Builders Inc.
Title: president
Phone: 541-617-1133
Contact by: E-Mail

Issue Description:

As I understand it you are currently reviewing, with public input, the application of pesticides on state forest lands in Oregon and I wish to comment on this issue. I realize that the use of pesticides can be an effective tool in the prevention of forest damaging insect outbreaks on state forest lands especially with the newer, safer water based pesticides that break down rapidly from UV light and leave little residues. As I understand it there are rules in place on set backs of 60' from private lands and classed salmonid bearing streams and bodies of water of which I want to emphasize the importance of these waters bearing non-destructive insect populations that are of the utmost importance to the rearing of juvenile anadromous and juvenile and adult resident salmonids. With the steady decline in populations of anadromous salmonids in Oregon partly because of past forest abuses this issue among others needs the careful consideration and planning each and every time application comes near one of these set back areas just like road building, harvest and controlled burning. I thank you for your careful consideration of this matter and my input.

First Name: Bob
Last Name: Rees
Email: bree@pacifier.com
Address1: P. O. Box 1196
City: Tillamook
State: OR
Zip: 97141-1196
Company: NW Guides and Anglers Association
Title: President/Founder
Phone: (503) 812-9036
Contact by: E-Mail

Issue Description: Managing forests for temperature control- specifically water quality to meet the spawning and rearing needs of sensitive salmonids grown within Oregon State Forests.

First Name: Bradley
Last Name: Knotts
Email: bknotts@odf.state.or.us
Address1: 2600 State Street
City: Salem
State: OR
Zip: 97310
Company: Oregon Department of Forestry
Title: Policy Analyst
Phone: 503-945-7484

Issue Description: The Board of Forestry should consider directing the Oregon Department of Forestry to commission a review of technical literature on toxicity of chemicals (pesticides, carriers, additives, and fertilizers) used in forestry in Oregon.

In 1995 through 1997, the board and department worked with toxicologists and others to review technical information on pesticide and fertilizer toxicity first for the adoption of the forest practice Chemical and Other Petroleum Product Rules, and then for the Aerial Pesticide Application Monitoring Report (published in 2000). Neither the board nor the department has conducted a formal review of forest chemical toxicity since 1997. The fertilizer study used in the development of the Chemical and Other Petroleum Product rules dates from 1992.

Additional research on pesticide toxicity has taken place in the last decade. In some instances, the emphasis has shifted from lethal toxicity to sublethal dose effects. For example, laboratory research has apparently shown negative impacts on salmonid reproductive or predator avoidance behavior when the fish were exposed to pesticide concentrations that could be expected, at least on a transient basis, under field conditions.

The Oregon Department of Forestry is often confronted with assertions or questions about newer research results on pesticide toxicity. The department does not have the expertise to respond directly. A literature review conducted by a reliable third party would provide the board and department with solid information upon which to base responses and decisions related to forest practice chemical regulations.

July 2007

Dan Postrel
Oregon Department of Forestry
2600 State Street, Building B
Salem, OR 97310

Re: Issue Scan 2007

Thank you for taking comments from the public on Oregon Department of Forestry (ODF) work plans for the next two years. Please consider the following:

1. Herbicides and other pesticides drift off the target sites and can travel long distances on air currents, affecting people, pets and wildlife, including salmon. ODF should use the best available science to guide policies for aerial application of herbicides, as follows:

- There are numerous well-documented studies that demonstrate the movement of pesticide droplets and vapors over long distances and there is also reliable medical research on the adverse impacts to the public. ODF needs to refer to existing research on the fate of aerially mobile herbicides, then act to protect public health, especially children.
- Monitoring of pesticide residues in the environment is strongly recommended. Even minute amounts of herbicide can adversely affect salmon and other anadromous species by altering their behavior and defenses in ways that diminish their survival. ODF policies should protect public resources such as air, water and forest ecosystems.

2. Smoke from slash burning is a known health hazard from the particulates resulting from combustion. Additionally, combustion of the herbicide residues and plastic found on slash are known to add toxic chemicals to the air. ODF should do more to protect smaller communities and rural areas from smoke.

3. ODF should strive for truly sustainable forestry and a precautionary approach, and do everything in its power to insure that more trees are planted, fewer are harvested, and all slash is chipped and returned to the soil instead of being burned. In the long term, ODF should work toward eliminating clear cutting, slash burning and all use of pesticides unless and until these practices can be proven safe for people, pets and wildlife, and sustainable for ecosystems.

Again, thank you for accepting public comments on ODF work plans.

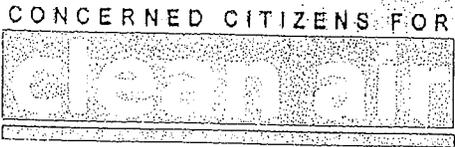
Sincerely,

Dan Postrel
P.O. Box 642
Newport, OR 97365

ID
41

ID
42

ID
43



23 July 2007

Dan Postrel
Oregon Department of Forestry
2600 State Street, Building B
Salem, OR 97310

Re: Issue Scan 2007

Thank you for taking comments from the public on Oregon Department of Forestry (ODF) work plans for the next two years.

Our group, which numbers about 60 individuals, is concerned with air quality issues from the standpoint of both human health and ecosystem health.

1. Herbicides and other pesticides drift off the target sites and can travel long distances on air currents, affecting people, pets and wildlife, including salmon. We recommend that ODF use the best available science to guide policies for aerial application of herbicides, as follows:

70 44

- There are numerous well-documented studies that demonstrate the movement of pesticide droplets and vapors over long distances. There is also reliable medical research on the adverse impacts to the public. ODF needs to refer to existing research on the fate of aerially mobile herbicides, then act to protect public health.
- Even minute amounts of herbicide can adversely affect salmon and other anadromous species by altering their behavior and defenses in ways that diminish their survival. According to the US EPA Reregistration Eligibility Decisions, there is an expected risk to aquatic organisms from use of certain registered herbicides. ODF policies should give top priority to protecting public resources such as water and forest ecosystems.
- ODF is behind California and Washington in forest chemical impact awareness and in developing precautionary models. ODF should make monitoring the environment for chemicals a high priority.
- ODF involves interest groups and stakeholders in the review of policies but neighboring landowners and the more distant public in general are not adequately represented. These people have very good reason to be a voice in the ODF process:
 - Any person can suffer both acute and chronic health effects from pesticides.
 - A significant percentage of the population have respiratory illnesses which put them at higher risk
 - A growing number of the public are becoming chemically sensitive and are at extremely high risk.

- Children from both adjacent properties and at schools, especially rural schools, are at higher risk for acute and chronic illness from pesticide exposures.
- Organic farmers/gardeners are particularly at risk
- There are many organizations that represent environmental issues and rural community issues and ODF should increase the representation of this portion of the public.

D 45

2. Smoke from slash burning is a known health hazard from the particulates resulting from combustion. Additionally, combustion of herbicide residues on the slash plus plastic coverings contribute toxic chemicals to the air. Not enough is being done to protect smaller communities and rural areas from smoke.

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46

3. ODF should strive for truly sustainable forestry, reduction of carbon emissions and reliance on the precautionary principle in all decision making.

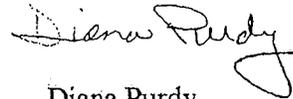
Again, thank you for taking public comments on the ODF work plan.

Sincerely,



Maxine Centala

Tom Kerns



Diana Purdy

Concerned Citizens for Clean Air
PO Box 375
Seal Rock, OR 97376
541 563-3651
www.concernedcitizensforcleanair.org

MR Dan Postrel, Agency Affairs
OREGON DEPT OF FORESTRY

Dear MR Postrel -

I am very concerned about the use of chemicals on our forest lands by the timber industry.

In response to your public input period ending 7/31/07 I urge you to give a higher priority to chemical monitoring and a more complete analysis of the potential negative impacts of current chemical applications in forest management. Thank you

please consider these comments from a retired scientist & administrator.

Thank you

Dean Nebergall
Dean Nebergall, P.E.
23674 LaBare Rd
Oswatch OR 97370



OFIC

July 18, 2007

Board Support
Oregon Department of Forestry
2600 State Street
Salem, OR 97310

To: Oregon Board of Forestry Members

The Oregon Forest Industries Council (OFIC) appreciates the opportunity to comment on the Oregon State Board of Forestry's (Board) annual "issue scan" process. OFIC represents large forestland owners in Oregon. OFIC members own and manage over 5 million acres of private forestland which provide raw materials to a forest sector that provides over 85,000 Oregon jobs.

OFIC provided comments on the original issue scan (attached) and appreciates the progress made to date on many of the important issues that face private landowners in Oregon today. OFIC especially appreciates the Board adding "Invasive Species" as a work plan element as OFIC (and others) requested during the previous issue scan.

OFIC would also like to thank the Board for their work on the smoke management issue. The Board's support and direction during the formulation of the rules was instrumental in producing the positive results to date. Similarly, the Board's policy guidance and support will be critical in resolving the issue that emerged from the 2007 legislative session---defining the "in-kind" landowner contributions to the complete and coordinated fire protection program upon which Oregon relies.

OFIC comments in this iteration of the issue scan process will focus on the areas where more Board attention could increase the rate at which the Department of Forestry (ODF) meets the goals set by the Board and suggestions on how the Board and ODF can get results more quickly and efficiently.

The Board's current work plan contains an element referred to as "Outreach to Urban Populations." While OFIC agrees that ODF has some role to play in the education of Oregon's urban population, the Oregon Forest Resources Institute should clearly be the leader in this effort. ODF can and should play a backup role, but this should not be a priority issue on par with other work plan elements. OFIC encourages the Board to remove this from their work plan and focus on their core missions---protection from fire, forest practice regulation, and management of state lands.

To that end, the lack of progress in the "Dynamic Ecosystem" work plan element has been disappointing. Work done on this issue to date by ODF staff has been excellent and continued focus on this should facilitate progress in the "Forest Regulation" work plan element as well. OFIC appreciates that staff are juggling considerable workloads but would nonetheless encourage the Board to make this a high priority.

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OREGON
FOREST
INDUSTRIES
COUNCIL

1149 Court Street NE
Suite 105
Salem, OR
97301

Phone
503/371-2942

Fax
503/371-6223

ID 48

ID 49

OFIC would like to focus considerable commentary on state forest management. As a stand alone work plan element and a program within ODF, significant work has been done and continues to be done on state forest management. Unfortunately, not much progress has been made towards either increasing harvest levels or defining what benefits are gained by structure based management (SBM) as requested during the previous issue scan process.

FD 50

ODF has invested substantial time and resources into the Harvest and Habitat (H&H) modeling process. Unfortunately, the promise of the H&H project never materialized. Once the model was complete and began to be useful, its use took a back seat to the development of "performance measures." The H&H model proved (at least to some) that the original promise of SBM--the ability to provide structure AND high harvests--was not achievable. Instead of pursuing modeling scenarios with less SBM, ODF chose to turn instead to the development of performance measures.

Clearly the existing plan is not going to meet any reasonable target for return on asset value given what was learned from the outputs of the H&H model. Yet ODF has spent months developing a suite of other benchmarks that will ostensibly measure other attributes of the contribution of state land management. Yet when this is complete, the basic message of the H&H model output and the initial calculations of return on asset value will still be true: current management is falling woefully short of what those lands could produce in terms of harvest and meeting their fiduciary responsibility to counties.

OFIC encourages the Board to simply finalize the measures "as-is", proceed to the decision step and modify the existing plan to increase harvest and revenues to counties consistent with the responsible and sustainable management of state forestlands.

FD 51

Finally, OFIC is concerned that the Board and ODF continue to fall into more "process" functions than necessary. A case in point is the Federal Forests Advisory Committee. We supported the Board's initiative in the last issue scan to do something about federal lands, but the resulting committee has been bogged down in process since its inception and seems to be moving very slowly towards its goal of providing recommendations to the governor. Charters, work plans, synthesis documents, etc., all take considerable staff time to develop, review, and present to the Board. ODF has an excellent staff that can and should simply be directed to produce results consistent with Board policy.

Thank you for the opportunity to comment. If you have any questions, please feel free to contact me.



Chris Jarmer
Director, Water Policy and Forest Regulation

July 27, 2005

Board Support
Oregon Department of Forestry
2600 State Street
Salem, OR 97310

To: Oregon Board of Forestry Members

The Oregon Forest Industries Council (OFIC) appreciates the opportunity to comment on the Board's annual "issue scan" process. OFIC represents large forestland owners in Oregon. OFIC members own and manage over 5 million acres of private forestland which provide raw materials to a forest sector that provides over 85,000 Oregon jobs.

OFIC supports comments made by its members and those of our allied associations; Oregon Small Woodlands Association, Associated Oregon Loggers, and Oregonians for Food and Shelter. OFIC believes the Board should and will take all comments to heart as they develop their priorities for 2006.

Existing Issues

OFIC and its members have been engaged with the Board during the initial issue scan and work plan development. While there is not total agreement, OFIC believes to a great extent ODF and the Board have identified and correctly prioritized the key issues. Specifically, OFIC appreciates the forest regulation work plan elements and the thoughtful way in which they will be addressed. Additionally, the forest vitality work plan contains an effort to address the mis-management of federal forest lands. OFIC applauds the Board's intentions to address the problems that arise from lack of any management of these lands -- buildup of fuels and the inevitable increase in fire danger that affects neighbors for example.

OFIC is also very interested in the management of state lands. While only some of our members are purchasers of state timber, ALL of our members have an interest in the implications of state management to management of private lands. OFIC has voiced concerns on many elements of ODF's management and applauds the Board's insistence on developing tools that will properly evaluate the costs of implementing those controversial management measures. This should continue to be an important priority for the Board.

New Issues

OFIC would like to make sure that the issue of invasive species management is included in one of the work plans. ODF and the Board can and should play a more aggressive role in preventing new introductions of invasive species and more

importantly coordinate with the Oregon Department of Agriculture to manage across jurisdictional boundaries the existing problems of invasive species.

OFIC would also like to expand the investigation of management measures employed on state lands. The H & H model will answer many questions in regard to the costs of implementing some of these measures, but it will not answer the obvious next question: what are we getting for our investment? While we should have good information on what the costs are, it is not clear that we have much solid evidence on the benefits. For example, what are the tangible benefits of salmon anchor habitats? Are they truly providing additional "protection" for fish, or instead are they adding additional cost and confusion for no tangible benefit?

Thank you for this opportunity to comment. If I can answer any questions, please don't hesitate to call me.

Chris Jarmer
Director, Water Policy and Forest Regulation

First Name: david
Last Name: eisler
Email: deisler@cyber-dyne.com
Address1: 88613 Nelson Mtn Rd
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Issue Description:

The Board of Forestry has a commitment to review the effectiveness of the Forest Practices Act rules and regulations through the best available science. The 2000 Chemical monitoring report completed only a portion of the identified research necessary to understand the impacts of forest chemical applications on water quality and fish and wildlife. The recommendations of that 2000 report have not been carried out by ODF. The staff, at the point that Paul Englemeyer and I met with them, was completely unaware of the last 10 years of scientific research on chemical impacts on aquatic life. ODF should not avoid prioritizing Chemical Monitoring to HIGH priority on the basis of cost. Through partnerships with government agencies and NGO's and universities, funding and research is available. ODF has an obligation to the Legislature, the BOF, and the public to provide assurance that current practices are protecting water quality and fish and wildlife. It is demonstrable that ODF cannot provide that assurance. Good policy needs to be based on good science.