#10'130

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

27 July 2007

I am grateful that the Department of Forestry has offered the public a chance to address concerns about the future direction of agency efforts.
Of great concern to me is the very apparent trend evidenced by the results of herbicide research. Over the last decade we have seen increasing evidence that herbicides are subtly affecting the various life stages of aquatic life, most notably, fish and amphibians.
These types of findings can only continue to increase. Once the effects on water quality and aquatic life become so blatantly clear the impacts to ecosystems (resources which belong to the public) may be irreversible
For any agency to say "We didn't know at the time...." will certainly not hold water.
Every public agency is obligated to operate under the best available science or the best management plan and ODF has sidelined this particular issue for seven years.
It is betraying public trust for an agency to acknowledge that they are charged with protecting the natural resources while ignoring or downplaying the existing scientific information.
I hope that the Department of Forestry will give high priority to Chemical Monitoring and will begin to examine the existing scientific research and convene a team of unbiased researchers to advise the department on the best direction towards sound chemical management.

Sarah Sheffield
88613 Nelson Mt. Rd.
Walton, Or. 97490

ID 131

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Company: Oregon Department of Forestry
Title: Assistant State Forester
Phone: 503-945-7205
Contact by: E-Mail
Issue Description: Oregon Forestland Classification

Oregon Department of Forestry assesses forest and range lands annually for the fire protection provided by the Protection from Fire Program. Oregon's forestland was classified for fire patrol purposes, more or less, on a district by district and county by county basis. The last substantive review and update of Oregon's Classification system was completed over 30 years ago. The fire protection environment, land use and values at risk have changed substantially prompting the need for the current review of forestland classification and assessment. On one end of the spectrum, the rural-forest interface continues to expand, often into what had been protected commercial forestland. On the other end of the spectrum, fires on under protected, non-assessed lands are problematic. They frequently threaten and sometimes burn onto protected, assessed forestlands.

To address this issue the State Forester in late 2006 formed a 29 member steering committee made up of a broad cross-section of individuals and representatives of organizations that share an interest in protecting the forest resources and the expanding wildland-urban interface. The committee has been tasked with completing a set of recommendations by January 1, 2008. The deadline will enable the Oregon Board of Forestry to consider proposed legislative concepts needed to implement the recommendations in time for the 2009 Oregon legislative session. Additionally, the committee may identify additional recommendations or concepts that may need further analysis and Board of Forestry direction.

ID 132

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State: OR
Zip: 97504
Company: Allied Solutions, LLC
Title: owner
Phone: 541-245-0770
Contact by: E-Mail
Issue Description: Support research and funding for use of pesticides and herbicides in Oregon.

The State Board of Forestry needs the newest info and results on safe use, but need all the tools for forest management. Chemicals are safe if used according to the prescribed safe methods. To remove important, critical tools from forest management is not the educated, informed approach. I grew up in the nursery business. There is a lot of info on how to raise trees, and habitats safely. We need to use that information for management. Sue Kupillas

First Name: John
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Company: Klamath County
Title: Commissioner
Phone: 541-883-5100
Contact by: E-Mail

Issue Description: In support of the goals of Objective 3 - Smoke Management, I urge the Board, in consultation with all wood-related industries, to examine alternatives to burning on both private and public lands in Oregon. There are chipping machines that can produce chips or sawdust to the degree of fineness required. Alternatively, the chips could be scattered to more quickly break down and organically enhance the forest floor.

As you know, voluntary smoke management plans are in effect in the Klamath Falls area. The Basin is a natural collector of smoke in still air, usually in the late fall / early winter, the same time that efforts are made to burn slash and perform prescribed burns. Once airborne, the smoke does not respect political boundaries or indeed the ownership status of the land from whence it came.

Klamath County was once in "non-attainment" status concerning our air quality. We don't want to go there again. Economic development efforts are rendered ineffectual when in that status.

I'm asking for the Board of Forestry's assistance in arriving at innovative, sustainable actions that can utilize the material from forest management, rather than consign it to "no use" by burning.

I do want the Board to know that I appreciate its efforts in improving forest health and productivity, as well as its efforts to improve our airshed.

Thank you for the opportunity to comment.

John Elliott

Klamath County Commissioner

Board of Forestry - 2007 Issue Scan

Printed Name:	Adam Novick
Affiliation:	Private landowner and graduate student in Environmental Studies
Mailing Address:	3715 Donald Street, Eugene OR 97405
	Email: anovick@uoregon.edu
	Voice: 541-345-0467

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

Re: Ecosystem services
Conservation banking
Conservation markets
Conservation incentives

Thank you for inviting public comment. In case you might be considering any of the above conservation policies, I would like to please suggest that they might be furthered by clarifying goals and strategies. I am concerned that without such clarification, these strategies risk inadvertently exacerbating the loss of biodiversity, through regulatory disincentives.

I understand these strategies all seek to improve conservation by recognizing and paying for the financial value of environmental amenities. I support such strategies, except when they are funded by exacting mitigation fees through increasing regulation of terrestrial species on private land (e.g., under US FWS habitat conservation plans or ORS 635-415 Fish and Wildlife Habitat Mitigation Policy). While those programs are often represented as making conservation profitable for landowners or compensating them for it, these programs instead inadvertently turn species into a financial liability for most landowners and thereby risk incurring harm to targeted species, such as by encouraging active destruction of habitat or discouraging maintenance essential to its survival. Species-based conservation banking typically taxes Peter to pay Paul, and landowners have no way to ensure they end up as Paul, or at least not as Peter. Establishing a conservation bank takes considerable resources, time, risk tolerance, and agency approval, and liability for mitigation fees typically reduces the market value of property even for landowners who never want to exercise development rights. Research shows that many private landowners are willing to conserve and enhance environmental amenities of their land, but that many of these landowners are sensitive to cost and averse to increasing regulation.

ID

For example, I suggest that mitigation fees might help conserve biodiversity when exacted from BPA based on the regulation of aquatic species, but might be counterproductive when exacted from private landowners based on the regulation of species at imminent risk from invasive exotic species and succession.

To avoid inadvertently exacerbating the loss of biodiversity through such programs, I believe it is essential to:

134 1. Clarify whether the primary objective is to conserve biodiversity or achieve some other goal.

135 2. Consider potential harm to species if based on increasing regulation of species on private land (i.e., harm to species from regulatory disincentives).

136 I fear that without these precautions, such programs risk inadvertently giving regulators unlimited license to sacrifice species as weapons to fight sprawl or other environmental threats.

137 To illustrate the need for such precaution, I'd like to please mention that at a USFS-sponsored conference on ecosystem services in Vancouver (WA) last January 18, most presenters equated "ecosystem services" with mitigation banking without specifying the nature of the underlying regulation, and one of the speakers suggested privately to me that perhaps we SHOULD sacrifice biodiversity to fight sprawl. I question whether such policy would be lawful, at least under the Endangered Species Act (and I reveal our conversation for that reason).

Thank you very much.

Return to: Oregon Department of Forestry
Attn: Dan Postrel, Agency Affairs
2600 State Street, Building B
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before **July 31, 2007**

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Company: Multnomah County
Title: Principal Planner
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Contact by: E-Mail

Issue Description: Our land use planning program is responsible for rural lands in the County outside the urban growth boundary. Many of the properties are zoned for commercial forest use. Some are managed strictly as wood lots, while others are developed with homes and used primarily for residential purposes. Those who reside in these areas are often not familiar with accepted forest management practices, so additional outreach by the State to urban populations would be appropriate.

ID 138

Our staff works with landowners to ensure new development has appropriate access, provides for fuel reduction, uses fire resistant materials, etc. and the County implements portions of the International Wildland Urban Interface Code in an effort to minimize wildfire risk. Our experience has been that building departments are not familiar with these codes. Additional outreach with these organizations would be appropriate. Also, assisting in informing the public about the need to minimize fire risk would be helpful.

ID 139

Lastly, we have had some bad experiences where timber harvests are approved by the State without thought to what is occurring on nearby properties that are in the process of urbanizing. An example was a harvest that authorized removal of trees in a drainage without accounting for a nearby, urban stormwater system that discharged a large amount of water into the feature. The result was severe erosion that has taken years to resolve. Improving coordination of state and local permitting may help avoid these types of occurrences in the future.

Thanks for the opportunity to comment. Please feel free to contact me if you have questions.

#10 /140

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Thanks for the opportunity to comment. Please feel free to contact me if you have questions.

ID 141, 144

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ID 141

Issue Description: The Board should address these 3 issues: 1) what changes need to be made in private and state forest management in order to mitigate climate change and to avoid exacerbating its effects; 2) conversion from painfully unsustainable (both ecologically and economically) practices (clearcutting and aerial herbicide spraying of 45% of the states forested land) to the sustainable (ecologically and economically) practice of growing industrial hemp instead of trees for most fiber, as well as stopping all clearcutting and large-scale pesticide application; 3) increasing public input and eliminating the requirement of citizens to post a prohibitive bond before filing a lawsuit.

Addressing the first suggested issue, we know definitively that clearcutting is one of the top three contributors to climate change (this is likely an underestimate of the impact over an extended time horizon), due both to the loss of carbon storage potential and the release of stored carbon from trees and especially soil. Healthy forests (not tree farms) are necessary for human life, as Jared Diamond points out in his book, Collapse. Forests are buffers against the ravages of climate change, which include a reduced snow pack and forest fires. We should not be adding to these water supply and fire hazard problems by clearcutting.

ID 142

Addressing the second suggested issue, neither clearcutting nor large-scale pesticide spraying are ecologically or economically sustainable. Furthermore, ODF has not performed impact analysis to determine what the costs of

its policies that allow these practices are to the public in the long-term. Herbicide spraying is making people and animals sick and contributes to our dependence on foreign oil. In 1916, Leister Dewey of the Forest Service, released a report, stating conclusively that hemp can outproduce trees for fiber 4:1 and that growing hemp for fiber rather than trees is necessary to sustain a healthy economy and environment into the future. By growing hemp for fiber, we can save money in embodied costs (like transportation) and allow some tree farms to return to forests, which can provide the ecosytem services that a tree farm cannot. Also, hemp farming will not require massive chemical inputs that tree farming does.

FD 143 Addressing the third suggestion, the Oregon Forest Practices Act is the most pathetic and wholly undemocratic law in Oregon history. It fails to restrict industry in any meaningful way and it prohibits citizen enforcement by requiring a high bond. This law defies the very spirit of the U.S. Constitution, allowing corporations to rob citizens of their natural resources and even poison them with no recourse. The citizens have a right to protect their natural resources which are essential to their life, liberty, and happiness. Children have a right not to be poisoned for life by herbicides.

ID 144 ODF needs to make serious changes and research the impacts of their policies

ID 149
150

Oregon Chapter Sierra Club
2950 SE Stark, #110
Portland, OR 97214

July 31, 2007

RE: 2007 Oregon Board of Forestry Issue Scan
Issues identified by the Oregon Chapter Sierra Club

Dear Mr. Postrel,

Please find below a list of issues identified by the Oregon Chapter Sierra Club as important for the Board of Forestry's consideration during its 2007 Issue Scan. The Oregon Chapter Sierra Club works across the state of Oregon, representing the concerns of our nearly 24,000 members, and our interest in protecting Oregon's forests, clean water, wildlife, fish and outdoor recreational opportunities.

Individual items on the following list are also being submitted through the Department's website, and are not listed below by any particular order of priority.

ID 145

1) **More funds for non-motorized recreation opportunities** – The state forests of Oregon are a largely untapped resource for non-motorized recreational opportunities. The Board and Department should seek significant budget increases for the 2009-2011 biennium to build additional trail systems, both developed and dispersed camping opportunities, and materials such as maps and brochures to highlight these opportunities for forest visitors and residents of Northwest communities.

ID 146

2) **Land acquisition through bond measures** – The Board should assess opportunities for acquisition of private industrial timberland that, if protected, would preserve crucial fish habitat, threatened or endangered species habitat, and older forest structure. Opportunities for land acquisition could be increased through bond measures that create funds for such acquisition and preservation. This could also increase public lands access for recreation as well as hunting and fishing.

ID 147

3) **Carbon sequestration** – The Board should investigate opportunities for raising revenue from state lands though forest preservation for the purpose of meeting carbon sequestration or carbon offset goals. Numerous funds and programs have arisen – some more credible than others – that allow forest landowners to preserve forests or lengthen forest harvest rotations in exchange for financial benefits. Such revenue could provide an alternative approach for payments to counties that are currently generated through timber sales. The state should position itself quickly so that it is not left behind as more and more forest owners opt for carbon sequestration programs.

IB 148

4) **Revisit Forest Stewardship Council certification for state forests** – The Forest Stewardship Council (FSC) is a globally recognized, third party and voluntary standards setting organization for well-managed forestry. Backed by environmental *and* industry stakeholders, FSC is the most widely accepted, rigorous and credible forest certification system. With an internationally-recognized label and robust chain-of-custody process, only FSC offers credibility and legitimacy in differentiating certified products in the marketplace, guaranteeing consumers that their wood products come from practices that protect old growth and promote local jobs. FSC certification will show the nation that Oregon is a leader in sustainable forestry, and in integrating environmental, social and economic demands on our state forests. Certification allows Oregon's Board of Forestry to put an independent stamp of credibility on its commitment to ensuring that the range of values provided by our state forests – wildlife habitat, clean air and water, recreation, sustainable wood products – are managed responsibly. Oregon's Department of Forestry has already taken initial steps towards certification.

A 'reverse assessment' was conducted in 2002 and, coupled with various outreach initiatives to key interest groups, indicated that FSC certification was the logical path to continue down. If Oregon's forest practices truly do '*meet or exceed*' FSC certification (as stated in the reverse assessment), then doesn't it make business sense to benefit from the commitment that Oregonians have made to forest stewardship? Following through with the work done to date, the Board of Forestry should request that the Forest Stewardship Council conduct a pre-assessment on some or all of its state lands.

Oregon should use this opportunity to join other states, such as Pennsylvania, New York, Massachusetts, Wisconsin, Maine, and Minnesota, in certifying its public lands. The benefits are many:

- Decreased conflict, tension and polarization between conservation, timber industry and State interests: FSC standards promote 'jobs *and* owls'
- Promotion of Oregon's forest products over wood that is imported from illegally logged forests.
- Access to the growing green marketplace, including LEED-certified building. As an international leader in 'green building', Oregon relies on forest managers to supply the increasing demand for certified wood. Our State's Department of Forestry can lead this effort.

IB 149

5) **Pesticide and herbicide spraying** – The Board and Department should develop new public health and wildlife protection policies related to pesticide and herbicide applications on lands covered by the Oregon Forest Practices Act. The state should utilize the best available science to guide policies to better regulate aerial applications of herbicides and pesticides. Past research by the ODF on long-term impacts of herbicide applications was never completed and the department has never researched the potential for and impacts of chemical drift from aerial

applications on forested land to neighboring properties. There are numerous well-documented studies that demonstrate the movement of pesticide vapors over long distances and there is also reliable medical research on the impacts to the public. ODF needs to refer to existing research or conduct new research on the impacts of aerially mobile herbicides and pesticides. The ODF should take steps to better protect public health and Oregon's streams while it develops new policies and pesticide and herbicide applications.

I D 150

6) **Animal damage control** – The Board and Department should assess policies related to controlling animals seen as problematic by private industrial forest landowners, particularly policies related to black bear control. According to the *Astorian* newspaper, each year federal Wildlife Services, through a contract with the Oregon Department of Fish and Wildlife (ODFW), kills bears who remove bark from trees on private timberland. This issue attracted national attention as it was revealed that state officials had been killing and gutting bears that had been trapped in snares, then dumping their remains in the Jewell Meadows Wildlife Area near Seaside, where a road builder for a logging company discovered about ten bear carcasses.

The Board and Department should investigate alternatives to killing bears to protect trees. An understanding of bear behavior and foraging preferences, coupled with the use of non-lethal preventive techniques and modified forest management practices, can help reduce bear damage to timber. For example, timber companies could adjust tree farm management in order to minimize or mitigate bear damage. For instance, bears are less likely to damage trees in uneven-aged forests or in forests with a diversity of tree species. Bears rarely damage bark if their traditional food sources are plentiful, such as food in large rotting logs or berries in the forest understory. Other effective forest management practices include delayed thinning of forests and avoiding fertilization.

Thank you for your consideration of these comments.

Sincerely,

Donald Fontenot
State Forests Coordinator
Oregon Chapter Sierra Club

Ivan Maluski
Conservation Coordinator
Oregon Chapter Sierra Club

ID 151

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Phone: 503-945-7435
Contact by: E-Mail

Issue Description: The Protection from Fire Program submits the following 2 Workforce Capacity issues for consideration of the Board as ongoing issues that will need attention/action by the program in the next few years.

1. The protection from fire program relies on a seasonal workforce for much of its initial attack capacity. Recruitment and retention have become increasing challenges as long term seasonal employees seek higher paying jobs elsewhere and recruitment efforts fail to attract a pool of satisfactory applicants. Federal and state agencies as well as the structural fire service seem to be more competitive in salary and benefits at the present time. A quality workforce has been one of the cornerstones of our success in the past and attention is needed to the issue.

2. The use of interagency contract firefighting resources has emerged out of necessity over the past 20 years. The contract industry has gone through gold rush-like cycles of growth and decline depending on the severity of the fire seasons. Recent movement to Best Value contracting and investments in accountability have caused significant improvement in quality and performance of most crews. Some problem contractors are still out there to be dealt with. Costs have risen steadily and much higher than the general rate of inflation and it may be difficult to control costs in the current seasonal fire cycle where demand for crews spikes beyond availability when there are several large fires at once in the PNW. As with many issues, a diversity of options may need to be explored to assure that Oregon has enough firefighters when needed at a reasonable cost.

ID 152

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Title: Protection from Fire Program Director
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ID 153

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Title: Protection from Fire Program Director
Phone: 503-945-7435
Contact by: E-Mail
Issue Description: 1 Definition

1.1 Lands that have no wildland fire protection, or a level of protection inadequate for high levels of initial attack and/or significant fires

1.1.1 Unprotected - Rangelands in that are outside of ODF, BLM, USFS, and Fire District protection

1.1.2 Under protected - Lands within a Rangeland Assoc or Rural Fire District (private lands outside of ODF protection) whose equipment, staffing and training are not sufficient during periods of high fire activity, or large fires.

2 Issue

2.1 Wildfires occur either entirely on un/under protected lands, or on these lands intermingled with other wildland fire protection agencies (ODF, BLM, USFS), and no mechanism exists for suppression of these fires.

2.2 To date this fire season, this issue has come up numerous times, and will likely continue throughout the summer.

2.3 Examples

2.3.1 Large fire near Boardman where a request was made for assistance. It was outside of any wildland fire protection agency's area of responsibility.

2.3.2 Egley Fire near Burns involved significant acres that were either unprotected, or protected by fairly new Rangeland Protection Associations. One of these Rangeland Associations has requested assistance to cover their fuel

costs, and to acquire replacement tires for their equipment.

2.3.3 Cottonwood fire north of Enterprise involved quite a few acres of unprotected lands intermingled with ODF and USFS protection.

2.3.4 Numerous fires in eastern Jefferson County on unprotected lands. These fires were monitored to assure they did not threaten protected lands.

3 Current System

3.1 Wildfire protection agencies have responsibilities to provide protection to lands within their jurisdiction.

3.1.1 Due to funding and liability issues, these agencies are generally unable / unwilling to be the primary provider of wildland fire protection to areas outside of their area of responsibility.

3.1.2 When these agencies provide resources outside of their area of responsibility, a lower level of protection to those paying their bills exists.

3.2 Through agreements (mutual aid and others), agencies work to provide wildland fire protection.

3.3 Several million acres exist in Oregon where no wildland fire protection exists.

3.4 Conflagration Act has potential for providing an extraordinary level of protection on a case by case basis but has been used only to protect structures.

3.5 A Governor's emergency declaration can also provide numerous resources to areas of need.

4 Alternatives

4.1 Status Quo

4.2 Broaden use of Conflagration from current approach to meet the need.

4.3 Governor's emergency declaration that outlines areas of responsibility and assures funding of costs, with increased availability of resources.

4.4 Governor's declaration that directs agencies to take on the extra work, and to come back to them for funding in the future (unsure funding mechanism).

ID154

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Title: Protection from Fire Program Director
Phone: 503-945-7435
Contact by: E-Mail
Issue Description:

The Protection from Fire Program submits the following aviation issues for consideration of the Board as they are emerging or ongoing issues that will need attention/action by the program in the next few years.

Increased use of aircraft on fires has become an essential element of our suppression success in recent years. Several challenges exist:

1. Need to acknowledge that federal action is not likely soon to eliminate the need for ODF contracted airtankers. Need to manage and fund them as a long term commitment.

2. The Medford airtanker base is partially funded by Secure Rural Schools funds. The void will need to be filled if county funding is lost.

3. The ODF airtanker program is being managed with retirees working seasonally, a long term staffing plan and transition is needed.

4. Exclusive use helicopter contracts have become essential to assure availability. They currently are funded by a special purpose appropriation. Long term funding is needed.

5. Fixed wing patrol aircraft are in short supply during peak demand times.

6. Aviation assets are currently being managed with very limited capacity.

ID 155

Dear Oregon Forestry Board.

I oppose the BLM plan to log OLD growth TREES in Oregon - ie Rogue River Drainage etc. "WOPR"

THESE OLD growth areas protect Fish wildlife & water quality -

Please oppose BLM on these grounds - our state is Being exploited by FEDERAL Politicians & As A NATIVE Oregonian I opposed to it.

Thank You

Sincerely Mark Tunno
P.O. Box 412
Fort Klamath, OR. 97626

Design solor consulting

Tunno Builders
Stone tile finish

Gen Con.
Lic # 127186

541-381-2383
~~C+ 208-401-0008~~

-----Original Message-----
From: SNYDER Mark R [mailto:mark.r.snyder@ci.eugene.or.us]
Sent: Wednesday, August 01, 2007 6:08 PM
To: POSTREL Dan
Cc: Paul Ries; BROWN Marvin D
Subject: BOF Issues Scan Comment

Hi Dan,

I feel I need to submit one more comment for consideration by the BOF during its Issues Scan. Thanks for passing this on, if you can.

The issue is a lack of funding throughout the state for maintenance of community trees. Oregon Community Trees members (Joe Lympe led the effort as I recall) tried to lobby for passage of a bill several sessions ago that would use ODOT revenues to fund maintenance of roadside trees. The effort failed.

As a local example, I had 10 FTEs on the tree crew when I arrived in Eugene as Urban Forester in 1999, with two crews with aerial bucket trucks and chippers and another ground crew with a truck and chipper.
There is now only one crew of three FTEs performing pruning and other maintenance activities on our estimated 100,000 street trees with only one bucket truck. Our funding source is mostly road funds. Those have been cut over the years. The City of Eugene has tried to replace lost monies that used to pass through Lane County with a variety of revenue sources, such as a local gas tax. We have established a Tree Stewards program (with assistance from ODF's grant program, now defunct) that uses citizen volunteers to help prune young trees. We do mainly request pruning, and we simply try to keep up with branch clearance over sidewalks and streets - and we can't keep up with that.

Other cities and towns identify the private property owner as the party responsible for maintenance of trees in adjacent right-of-way.

Either way, street trees and park trees are not being maintained, from my professional perspective, having worked in the field for 30 years.

JD 156

Years of deferred maintenance results in an unhealthy and unsafe urban forest, with very real impacts (literally!) on the public.

Just as Oregon Community Trees and ODF need to identify funding sources for restoration of the Urban & Community Forestry Assistance Program, we need to figure out how to fund the maintenance of an enormously important asset - our community trees.

Thanks,

Mark
Citizen,
President, Oregon Community Trees
and
Mark R. Snyder
Urban Forester
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Parks and Open Space Division
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ID 151 - 158

OREGON COMMUNITY TREES

Board of Directors

Executive Committee

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PNW Chapter – International Society of Arboriculture Representative
City of Eugene

Lara Rowles, *Vice President*
EF Nursery, Inc.

Ramona Arechiga, *Secretary*
Friends of Trees

Al Tocchini, *Treasurer*
AlTo Forestry Consulting

Rob Crouch, *Past President*
City of Portland

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Oregon Department of Forestry

John Bellon
City of Klamath Falls

ID 157

Joe Carli, *Oregon Association of Nurseries Representative*
Moana Nursery

Greg Giesy, *Oregon Landscape Contractors Association Representative*
Distinct Possibilities Landscapes

Barbara Hollenbeck, *Ex-officio*
USDA Forest Service

Jim Johnson, *OSU Extension Representative*
Oregon State University

Brian Kelly
Hells Canyon Preservation Council

Katie Lompa, *Ex-officio*
Oregon Department of Forestry

Pat Moran
Oregon Department of Transportation

Jason Morrow
Integrity Tree Preservation

Bill Narver
Albany City Tree Commission

ID 158

Chris Neamtzu
City of Wilsonville

Kristin Ramstad, *Ex-officio*
Oregon Department of Forestry

Kevin Rea
Kevin Rea Company

Meryl Redisch
Audubon Society of Portland

Matt Stine
Ash Creek Forest Management, LLC

Rick Zenn
World Forestry Center

August 1, 2007

BOF ISSUES SCAN COMMENTS FROM OREGON COMMUNITY TREES

Submitted by Mark R. Snyder, President

Thank you for the opportunity to provide comments that Oregon Community Trees (OCT) thinks are important for the Board's Issues Scan public outreach effort.

When I provided public testimony representing OCT in November of 2005 on Objectives 1 and 2 of Issue #4, Outreach to Urban Populations, I basically said that you had some real good ideas. I still think the 2007 Work Plan has some real good ideas, and my comments are intended to affirm your objectives and offer continuing support from OCT to help achieve your goals.

OCT sees the most important issue facing Oregonians to be the lack of state funding for ODF's Urban & Community Forestry Assistance Program.

OCT members were actively engaged in a legislative outreach effort this past session, and we worked closely with ODF to lobby for support of the Governor's recommended budget (with a first-ever line item for urban forestry). The final budget results are more than disappointing. The department's 3 FTEs were cut to 2 FTEs on July 1st. Further federal program cuts are expected, which will leave one urban forester for the entire state. Federal grant programs have been cut, and we face a very real prospect of a completely dismantled program within 2 to 3 years.

What can the BOF do to persuade the Governor's Office and the Legislature to restore funding for this program? What can OCT do to help this effort? We are already planning meetings with Marvin Brown and his staff to work out the next strategies we can undertake to continue our work, but we need the firm support of the Board to underpin our efforts.

The second-most important issue OCT sees is the need to reaffirm the importance of and implement the approved BOF 2007 Work Plan.

Take a moment to scan these headings:

Board of Forestry Work Plans June 2007
Implementation of the FPFO
State Forests Management
Forest Vitality
Outreach to Urban Populations
Dynamic Ecosystems
Forest Regulation
Wildfire Risk Management
Invasive species

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All of these plan elements relate to urban and community forestry planning as much as they relate to traditional, rural forestry planning.

Now read this:

> *Outreach to Urban Populations.*
> By helping Oregonians understand forest management principles in their own "backyard", the parks and streetscapes of our cities, we can enhance understanding of how all forests, including rural, state and private forests, can be managed in a sustainable manner. Healthy forests, both urban and rural, need to be identified as a key component of what makes Oregon a desirable place to live.
>
> *Issue A5*
> Urban Forestry issues can not be separated from rural forestry issues and management needs. Issues such as salmon restoration, community and economic development, and Wildland fire prevention all have urban forestry facets to them. There are tremendous yet often unmet opportunities to develop urban forestry components to efforts addressing broader natural resource situations.

I could not have said it any better. You've got it right. Let me know how we can help you.

Respectfully,

Mark R. Snyder
President
541-844-8139

Oregon Community Trees (OCT), a non-profit state-wide group that acts in an advisory capacity to the Oregon Department of Forestry's Urban and Community Forestry Assistance Program, appreciates the effort the Board of Forestry (BOF) has made this year in addressing urban and community forestry issues. The July 2005 BOF Work Plans identified Issue 4 as **Outreach to Urban Populations**. "This plan seeks to build urban Oregonians' connections with forestry and its importance to our state's quality of life. The work area envisions the use of various tools, such as urban forestry assistance, the Tillamook Forest Center, and public education opportunities, to raise urban Oregonians' awareness about the principles and importance of sustainable forestry."

OCT's Board of Directors has asked me to provide comments today on the Issue you are considering. Specifically, on your agenda today are Objectives One and Two. A White Paper prepared by ODF's U&CF program manager will help you discuss the future scope of the program. The purpose of the discussion is to help guide the BOF in deliberating on budget development for 2007-2009. OCT is a stakeholder group identified in the BOF's process. Thank you for including us in your work plan. I will also comment in my capacity as Urban Forester representing the City of Eugene Parks and Open Space Division of the Public Works Department.

The Mission and Vision of the BOF and OCT are similar. Oregon will ha
a sustainable flow of environmental, economic, and social outputs and b
"To promote healthy urban and community forests through leadership, e

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advocacy." This common ground we share is the foundation for ODF's U&CF program and the value this program brings to all Oregonians.

Here are some thoughts on your work plan items today.

Objective 1
Serve as a catalyst to facilitate the development of sustainable and comprehensive urban forestry programs in Oregon communities through urban forestry planning and municipal program development.

ODF's U&CF program certainly fulfills this objective from the perspective of OCT and the City of Eugene. It provides **leadership and technical advice** on sustainable program development throughout the state, not just in the larger urban areas, but in smaller communities as well (where the services are often even more appreciated). **Grant monies** have been made available that stimulate local awareness of the value of trees in communities.

With federal funds declining and costs rising in the U&CF program, this wonderful program of grants has been proposed for cancellation this coming year. OCT's Executive Director position is half funded by this grant program, so we will definitely suffer without the funding. More importantly, the people of Oregon won't have the chance to get to know each other and help each other build their communities in the same way without this program element. We urge you to work to fully fund and expand the U&CF program so that this and other program services can continue and thrive in accomplishing the goals of the Forest Plan for Oregon.

Objective 2
Expand the visibility of the urban forestry program among local and state elected officials to enable community leaders to better understand the Department of Forestry's role in promoting sustainable forest management.

The work of OCT includes public outreach in many forms. We coordinate, in partnership with the Oregon Association of Nurseries, Oregon state-wide Arbor Week events, including the annual Governor's Grove tree planting. We deliberately hold our quarterly Board meetings in different areas of the state, from La Grande to Seaside to Klamath Falls, to a lunch and tour in Scio. We make sure we recognize the Tree City USA program's Tree City of the Year by bringing our Board, and business, to the winning community.

ODF's U&CF program is the catalyst that annually brings ODF foresters to local Arbor Day events – I have benefited from having the Service Forester in Western Lane give our Tree City USA award to Eugene's Mayor every year I've been here. Marvin Brown personally helped the Mayor plant the ceremonial arbor day tree when we received our 25th Tree City USA award two years ago. The event always provides an opportunity to educate folks (parents can get educated almost as easily as their kids) about the importance and benefits of trees and forests in our community.

OCT conducts an annual educational program that serves to keep professionals and citizens alike informed about important community tree issues. These conference themes also address issues that the BOF recognizes as important throughout the state – from statewide environmental planning and water quality issues affecting listed species to local street design for improved business and community development. We spread the word that trees and urban forests help reduce storm water runoff, help cool our cities, help prolong the useful life of our asphalt streets by shading them, help clean our air, help beautify our towns, help increase our property values, and help attract more customers to local businesses. Hazard tree management workshops and emergency prep seminars are also part of our work plan. Finally, our OCT Urban and Community Forestry program annually recognizes and celebrates the accomplishments of individuals, groups, and builders who contribute to the idea and the reality of sustainable forestry in Oregon.

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SUMMARY

An increasing proportion of Oregonians live and work in urban (or nearly so) environments. That's where ODF's visibility, successes and reputation will be made.
To the extent the Board of Forestry commits to Oregon's identifiable urban forest per the Forestry Program for Oregon, it is imperative that the only state agency concerned about forests' sustainable contributions to humans be clearly invested in the establishment, management and protection of urban forests.

As I read the several program options for urban forestry listed in the White Paper, I was concerned that the Status Quo option description did not extend the prediction of program impact beyond 2007. What will happen with increasing program expenses and declining federal revenues (with possible loss of all federal revenues if no state matching funds are forthcoming) in three years from now? In five and ten years? OCT urges the Board of Forestry to fully fund ODF's U&CF program. We feel an expanded program would best meet the needs of Oregonians, and an expanded (and potentially modified) program could help the Board achieve its goals and work plan.

Thank you for the opportunity to provide these comments. OCT would be glad to be of any assistance we can to the Board in your challenging work.

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Board of Forestry - 2007 Issue Scan

Printed Name: Brett Brownscombe
Affiliation: Oregon Trout
Mailing Address: 65 S.W. Yamhill St., Suite 300
Portland, OR 97204

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

ID 159 ① Evaluate (using a qualified economist) the economic contribution/valuation of non-timber natural resource assets and activities provided by the forest lands of Oregon.

ID 160 ② Stream restoration: take steps to ensure FMP and the For. Pract. Act support coho recovery (esp. in addressing known limiting factors). Evaluate adequacy of FMP + FMP/regs. in addressing limiting factors to stream/water quality/habitat health (including road-based sediment + large wood recruitment and movement). This issue is even more relevant in light of recent court decision on coho ESA listing. Oregon Trout intentionally did not join that suit b/c we wish to work on stream restoration/coho recovery outside of the courts, but we remain concerned re. FMP and FPA/reg's adequacy in meeting recovery (not just no-net-loss) objectives.

ID 161 ③ Conversion - loss of forest lands to real estate development interests, and consequences to human and natural values tied to forest lands staying in forest sustaining hands.

ID 162 ④ Biomass - development of small-scale, community-based efforts to develop local biomass facilities, doing so in a way that integrates other value added manufacturing approaches (e.g., flooring, firewood, furniture, etc.) - not just stand-alone biomass - but integrated w/ other econ. benefits - and not large scale biomass. Use this to deal w/ fire risk/forest conditions, global warming (carbon reduction from less slash + wildfire burning), and local econ. development.

Value Added

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

before **July 31, 2007**

ID 166 (1) Support for the forest sector as a renewable economic base: Many small forestland owners are located near growing Oregon cities whose political leaders place more "value" on other land use than working forestlands(1)
Support for the forest sector as a renewable economic base: Many small forestland owners are located near growing Oregon cities whose political leaders place more "value" on other land use than working forestlands. Alongside this pressure, mill closures due to lack of wood supply, limit markets for family forestland owners and reduce economic viability and state revenue. A healthy forest economic sector is critical to the long-term viability of small forestland owners and to the state.

ID 167 (2) Reviewing and revising our regulatory approach: One-size-fits-all approaches to regulations often have the unintended consequence of reducing the economic viability of small forestland ownes and further drive conversions. Many of these regulations are driven by federal laws (ESA, etc.) and provide landowners no incentives for doing the right thing. The need to develop regulatory policy based upon holistic and sound science is a must if we are to retain our family forestlands.

ID 168 (3) Addressing the political issues of commercial management of federal lands: OSWA suggests at a local level, family forestland is at high risk of fire, insect and disease infestation, and conversion to higher "value" use. Frequently, neighboring federal lands with severe forest health problems and limited commercial use increase these risks. At a global level, Oregon has to play our role via good public land management in supplying our own needs from our own lands. Political leadership, funding and technical advice is needed to address these threats. The need for the department to help stimulate action on federally managed land, particularly in eastern Oregon, continues to be vital. Oregon can show a model of successful active management on state and private lands. We are concerned at the lack of leadership on the federal lands issue, and the development of yet another committee to discuss this issue has many of our members frustrated.

ID 169 (4) Designing new delivery systems for landowner and neighbor education: OSWA suggest that before adding any new policy work to its numerous work plans, the Board should work to stabilize budgets for stewardship positions in the field. In addition, the Board should consider additional, innovative ways of meeting family forestland owners' needs for cost-effective, science-based means of meeting and influencing regulatory requirements, and developing land management plans that lead to desired action. This should include creative thinking about a range of possibilities, including working with partners to provide information to a large group of volunteers, who could then work directly with landowners.

ID 170 (5) Addressing the generational shift: Many family forests will be passing hands from one generation to another in the coming decade. this will further increase the likelihood of conversion in the Northwest unless action is taken over issues such as the inheritance tax.

Oregon Small Woodlands Association
Mike Gaudern
1775 32nd Place NE #C
Salem, OR 97303

July 31, 2007

Steve Hobbs, Chair Board of Forestry

Chair Hobbs,

The Committee for Family Forestlands (CFF) is providing this letter as a formal document to the Board's 2007 issue scan. In April 2007, the CFF conducted the second family forestland symposium, *Looking Forward II, Oregon Families & Their Forestlands: What's at Stake.* One of the purposes of the Symposium was the development of potential solutions to the issues challenging family forestland viability. The following issues were identified at the Symposium, and should be considered in developing Department of Forestry work plans for the upcoming years.

Issues Identified

- Uncompensated services – the need to provide incentives for services provide to the public.
- Intergenerational transfer – how to ensure orderly transition of forestland from current generation to the next.
- Conflict of values - people who own forests for income have a different set of values than those who own forests for amenity purposes.
- Global climate change.
- The delivery mechanism for influencing stewardship and sustainability is not effective for either participating or non-participating groups and individuals.
- Economic challenges of family forestland owners.
- Engaging the wider community of family forestland owners.
- Viability of family forestlands, values conflict with urban neighbors, unpaid services

Summary and Discussion of Major Issues

For most symposium participants, **compensation for ecosystem services and other societal benefits** is clearly the most urgent challenge. Five groups addressed it in slightly different forms. A synthesized list of solutions from these groups:

- Develop financial incentives (cost-share programs, others) for maintaining and enhancing environmental values and services
- Reduce state inheritance taxes
- Develop and increase access to market for carbon sequestration
- Enact "hold harmless" agreements protecting landowners from trespasser liability lawsuits

- Enact tax credits for keeping land in forest
- Create a "green credit" forest fund to pay for conservation easements on family forestlands
- Develop a multi-level set of performance standards, with policy and market incentives for managing to stricter environmental standards than those in the Forest Practices Act
- Improve Oregon's land-use planning process to increase private flexibility while retaining public value

The next most important challenge is to **address the conflict of values, reach out to the wider community and build on common ground.** Two groups addressed this issue, generating these solutions:

- Develop more intensive public education on forestry and family landowner issues
- Organize more family forest tours for the public and school children
- Increase capacity of family forestland owners to engage the wider community and elected officials
- Partner with NGOs to find funding, provide training, develop educational material, and build solutions
- Reach out to rural property owners with diverging views
- Promote work opportunities for older children

The third most important challenge is to take advantage of **opportunities presented by global climate change**. The group that addressed this problem looked past the financial incentives of carbon banking to make the point that the public alarm over global climate change offers an opportunity to align the interests of family forestland owners with those of the larger society. In this way, this group's solutions also address conflicts of values and outreach to the community.

This group proposed that family forestland owners:

- Demonstrate how management practices align with societal values
- Create jobs and business opportunities that improve economic conditions and the environment
- Stimulate synergy between environmental groups, tree farmers, manufacturers, and consumers
- Reconnect urban and rural Oregonians through the marketplace
- Reduce carbon output of forestry; increase carbon storage in forests

The fourth most important challenge is to **improve the delivery of stewardship information to family forestland owners**, targeting particularly those who are not now being reached. The solutions proposed by the group that addressed this need also echo concerns about conflicts of values and outreach to the community. The group proposed the following solutions:

- Train foresters who interact with family forestland owners to talk to them about the Ties to the Land family succession program

- Use the Ties to the Land program to engage landowners who are not now being reached by any forestry stewardship programs
- Build new coalitions among public agencies, private citizens, and industry

The fifth most important challenge is to **expand markets for locally harvested forest products**. The group that addressed this issue proposed these solutions:

- Develop local farmer's market-style markets for wood products
- Build awareness of and pride in using locally grown wood and other products
- Improve marketing and public relations efforts on behalf of local wood products (for example, "Get on Oregon Field Guide" or Build Local Alliance, buildlocal.org)

These proposed solutions resist neat categorization under their various topic headings. Rather, they overlap with one another to address several problems at a time, testifying to the interwoven nature of the challenges faced by family forestland owners.

In summary, the members of the Committee for Family Forestlands supports including these issues in the 2007 issue scan process.

There is additional information regarding theses and other issues developed at the Family Forestland Symposium. Please refer to the Symposium proceeding (attached) for a complete list of all issues raised.

Sincerely,

Ron Cease, Chair
Committee for Family Forestlands