



SAVING THE LAST GREAT PLACES ON EARTH

Recommendations to the Board of Forestry regarding FY 2006 Work Plan Priorities

1) Advance the use of alternative tools for protecting Oregon's forests

Issue:

In 2006 and beyond, the disposition of an increasing number of large timber land holdings will likely occur in Oregon. This disposition will raise challenges to the joint goals of promoting forest industry competitiveness and of protecting and enhancing the water resources and wildlife habitats in Oregon. The lack of predictability and stability may not only result in socio-economic disruptions to Oregon's forest industry and forest-based communities, but also decrease the quality of Oregon's forest ecosystems through conversion to other uses and/or forced shorter rotations. Two new tools are available in Oregon to help address this problem: Community Forest Financing and the Forest Legacy Program.

Action Areas for the Board of Forestry:

We recommend that the Board of Forestry become informed advocates for these new tools and promote transactions and funding approaches to help meet the Board's economic vitality and ecosystem health goals.

- Support the use of alternative tools for protecting forests and controlling development such as community forest financing (HB 2729) and the federal Forest Legacy Program.
- Advise state financial institutions (e.g., PERS) about forest investment options as a means to advance Board of Forestry goals.
- Provide technical assistance to help public, community and non-profit buyers do the "due diligence" needed to evaluate potential transactions with Community Forest Financing.
- Evaluate the need for, and develop if warranted, additional compensation strategies to stop conversion of forests to non-forest uses.
- Support and evaluate the benefits of early projects proposed under the Forest Legacy Program; and
- Request legislative approval to expand the Program to apply throughout Legacy Areas identified in the Oregon Assessment of Need.

Related to Planned Board of Forestry Strategies: B.1, B.2, B.4, B.4, B.8, B.11, B.12; C.1; D.8

2) Address Barriers and Disincentives to Oak Savanna/Woodland Restoration

Issue:

The Nature Conservancy, Oregon Department of Fish and Wildlife and others have identified protection and restoration of oak savannas and woodlands as biodiversity conservation priorities in the Willamette, Umpqua, and Rogue Valley, and in the Columbia Gorge and the Klamath Basin.

A growing number of private landowners are aware of this issue, and interested in helping to restore oak savannas and woodlands. Oak habitat restoration typically includes removal of some or all of the Douglas fir and reduction in the density of oaks to allow for the regeneration of open stands of large trophy-form oaks with a diverse understory of native shrubs, grasses, and forbs. This management runs afoul of the legal requirement for replanting to designated stocking rates required by the Oregon Forest Practices Act. In addition, potential loss of forest tax deferral on restored oak habitats may be a disincentive to otherwise interested landowners.

Action Areas for the Board of Forestry:

Department of Forestry staff have initiated conversations with interested parties regarding these issues. We recommend that the Board of Forestry support and assist staff in their analysis of existing state rules and regulations to determine if they can be interpreted or modified to allow landowners to restore oak habitats without losing their forestry tax deferral. Potential questions within this analysis may include:

- Do oak savannas meet the definition of the Forest Practices Act minimum stocking requirements?
- If they don't, is creating an oak savanna an acceptable change of land use?
- If it is an acceptable land use change, how does the landowner demonstrate active management toward creating oak savanna?
- Does/should oak savanna still qualify for forestry deferment status with the county assessors?
- What are the elements of a successful oak savanna project? If the Forest Practices Act is interpreted or modified to allow oak restoration, what criteria should ODF use to evaluate projects for compliance with new rules? How can the Department ensure that timber owners/managers aren't just trying to avoid replanting rules?
- For counties who have not chosen to participate in the Wildlife Habitat Conservation and Management Program to allow landowners to qualify for forest and farm tax deferral if they manage under an approved wildlife plan, is there a way to continue designating oak woodlands as forestry uses?

Based on that analysis, we further recommend that the Board of Forestry take necessary steps to eliminate any regulatory barriers and disincentives for private landowners interested in restoring oak habitat.

Related to Planned Board of Forestry Actions: A.1; A.3; A.5; B.5; C.1; E.5

3) Develop tools to prioritize treatments to restore forest resiliency and address barriers to implementation

Issue:

Current estimates suggest that 33,000,000 acres in Oregon have altered fire regimes due to past suppression efforts. Suppression in fire dependent forests results in an increased density of trees and shrubs, proliferation of ladder fuels, accumulation of dead and down fuels, and a shift in composition to less fire-resilient species and increase the vulnerability of forests to insects and disease. Our capacity to restore forest resiliency through use of prescribed burning and mechanical thinning is insufficient to address this issue.

Additional barriers exist to addressing this problem – including disagreements on best management practices, markets for bi-products, and planning. To address this problem, land managers need better tools to evaluate where to best allocate limited resources to address this situation. Additionally, land managers and stakeholders should identify and address current barriers to success in restoring fire resiliency, including the need for additional funding to increase our capacity to implement ecologically sound treatments in the highest priority areas. In addition to improving health of forests, restoration of forest stand structure can provide significant economic benefits by providing jobs in the woods managing prescribed fires, thinning overstocked forests, and restoring sensitive habitat types.

Action Areas for the Board of Forestry:

- Evaluate the pilot project being conducted by the USDA Forest Service PNW Experiment Station on behalf of the Department to develop Vegetation Dynamics Development Tool models to identify the most important areas to treat.
- Expand the pilot project to cover the entire state.
- Direct staff to participate in a Fire Learning Network with federal agencies, local communities, and The Nature Conservancy to advance the discussion of best management practices, identify desired conditions of forests and develop implementation strategies;
- Commission an assessment of: a) economic costs and benefits of alternative approaches to fuels reduction and, b) work force needs and opportunities to implement alternative approaches to fuels reduction; and
- Convene a work group of diverse interests to define the barriers and identify solutions to addressing this problem including funding needed to improve our ability to treat the most important acres rather than the easiest acres in the most ecologically sound manner.

Related to Planned Board of Forestry Actions: A.3, A.9, B.8, E.1, F.1, F.2, G.2

4) Partner with OWEB, ODFW, and the Institute for Natural Resources to improve spatial land management allocation and restoration activities data in Oregon

Issue:

The Department of Forestry's efforts to improve spatial data on land ownership in Oregon provides an excellent base for improving our collective ability to manage the State's natural resources. Better information on public and private land management allocations and restoration efforts would extend the benefits of this new coverage to improve our ability direct additional conservation efforts and may enhance efforts to predict potential natural resource supplies.

The Institute for Natural Resources manages information on areas designated or established to conservation of native habitats and species such as Research Natural Areas, Wilderness Areas, and some privately owned conservation areas. The Oregon Watershed Enhancement Board, Bonneville Power Administration, and others maintain information on the location of restoration projects. However, collectively these data only identify a small portion of the conservation land allocations and restoration efforts completed and underway in the state. Ultimately, a central geographic information data system that includes the full range of management allocations (from regulatory stream set backs and inoperable areas to the location of individual restoration efforts) would greatly enhance private and public land managers' understanding of conservation and natural resource needs and activities, improve natural resources supply forecasting, and advance the efficiency and effectiveness of additional conservation efforts.

Action Areas for the Board of Forestry:

- Partner with the Institute for Natural Resources, Oregon Watershed Enhancement Board, Oregon Department of Fish and Wildlife to define what and how land stewardship data should be categorized, organized, and maintained to better inform private and public land managers natural resource management efforts.
- Make existing Department of Forestry data available to the Institute for Natural Resources for inclusion in their stewardship data layer (such as current state land management allocations such as viewsheds, inoperable areas, riparian buffers, etc. and private forest and riparian restoration and protection efforts funded through the Forest Stewardship Program and other similar programs)

Related to Planned Board of Forestry Actions: A.2, A.3, C.6, E.1, E.5, E.6

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Oregon's Changing Kaleidoscope of Forestland Ownership

Family forestland ownership represents a diverse land base in Oregon. According to the OSU Extension Service, there are over 166,000 family forestland owners in the state, representing 43% of the private forestland ownership. Generally, these parcels are small and often require unique approaches to management, regulation and landowner assistance. The families who own these properties have committed significant financial resources to a high-risk investment that matures over a very long period of time. Often entire savings for retirement and education of children are tied up in a family's forestland investment.

Non-industrial forests typically occupy lower elevations, often along rivers and streams. These forests contribute immensely to ecologically significant riparian areas and can provide connectivity between wildlife habitats in areas where the resource base has been converted and fragmented by other uses. While non-industrial owners hold almost half of the privately-owned forest land base, they represent only 16% of Oregon's timber production – demonstrating on-the-ground management practices that encompass a wide mix of values and forest conditions.

Trends from 1990 through 2000 show 50% of forestland ownership changed hands in Western Oregon, alone. Currently, Oregon's family forestland ownership base loses 26,000 acres per year to industrial ownership or non-forest uses. Oregon's proud history of incubating a vibrant and diverse forestland ownership class is eroding.

The Board of Forestry needs to focus on the kaleidoscope of ownership changes seen in the forestland base, and the impediments and incentives related to keeping non-industrial landowners in the business of growing trees. Focus should be made with anticipation of identifying and promoting specific, actionable items related to issues such as:

1. The specific impacts of estate and other tax regimes on multigenerational forestland management and the fragmentation of ownership parcels;
2. The specific impacts of land use laws that prohibit siting caretaker dwellings on multigenerational family forestland;
3. The escalating decline of forest health and industry capacity in Eastern Oregon;
4. Disincentives to successful multigenerational management including the effect of regulatory costs and certainty (or uncertainty) over time; and
5. A quantified recognition of the regulatory responsibility and costs to private landowners for providing public benefits and the portion of these quantified costs actually borne by the public.

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Issue Description:

How can we assist the private landowner in order to achieve a conifer-dominated RMA? The goal is worthy of consideration. I own 33.4 acres. I paid \$1500.00 for a Stewardship Plan. I have just completed marking off approx. 4000 ft. of Type F RMA. After reading the OFPL manual, I have concluded that it is not feasible for me to participate in the above stated goal. The standard target BAF's keep me from harvesting now and they will keep my grandchildren from harvesting later. Even the conversion and retention zones make it difficult to interest a logger because you break up forest types into scattered blocks. To bring in a "processor" has now become a mute issue. The landowner is still held accountable to make the transition successful. It appears to me that a 100 ft. RMA on my flat land is not justified. One shoe does not fit all feet. This is a issue that needs to get back into the hands of trained professional foresters. I also believe that the Stewardship Forester should have some lateral to make decisions based on ground observations. Have I come to the wrong conclusion or am I right? I hope you will give this issue some additional thought. If I can be of further help let me know.DF

Thanks, Don Franzen

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Issue Description:

Federal regulatory alignment with the Forestry Program for Oregon

It may be appropriate for the Board and the Department of Forestry to renew a dialogue with federal regulatory agencies, particularly EPA, USFWS, and NOAA Fisheries within the context of the Forestry Program for Oregon and work towards greater federal alignment with Forestry Program for Oregon strategies and actions. The products of existing Board Work Plans could also be brought into this dialogue (example: Dynamic Forest Ecosystem concepts).

A desired outcome would be a win-win, cooperative environment for administration of both state and federal programs and increased understanding, acceptance, and support of the sustainable forest management framework in the Forestry Program for Oregon.

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Issue Description:

Revisiting Board Policy on Third-Party Forest Certification

In 2006, the Board may be asked to consider the results of a Forest Stewardship Council assessment of the Sun Pass State Forest and will also receive the results of a study of Oregon's potential for recognition under the international Programme for the Endorsement of Forest Certification. Work will also be continuing in the Private Forests Program to create efficiencies by better aligning state processes affecting private forests with the processes used by the dominant third-party forest certification systems operating in the state.

In 2002, the Board of Forestry developed draft Oregon criteria for credible forest certification systems. It is appropriate for the Board to revisit and update these criteria and to discuss and develop a policy on future state government involvement on the topic of forest certification, particularly the Board's role as a landowner, regulator, and promoter of forest stewardship.

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Issue Description:

Oregon Land Use Planning Program Review and Modification

It is likely that the 2005 Oregon Legislature will mandate a comprehensive review of the state's Land Use Planning Program over the next two to four years. At the same time we are all adjusting to life after Ballot Measure 37. The strong and stable Oregon Land Use Planning Program that we have become accustomed to for many years may become just a memory.

In the Forestry Program for Oregon, the board states it will continue to support an effective, science-based, and adaptive Oregon Forest Practices Act and a strong but flexible Land Use Planning Program as the cornerstones of forest resource protection on private lands in Oregon. Throughout the Forestry Program for Oregon, maintenance of the forest land base is mentioned as a prerequisite for attaining the environmental, economic, and social benefits Oregonians want from our forests.

Within the context of the Forestry Program for Oregon, it would be appropriate for the Board to discuss and decide in the near future on a policy position it would like to take both on future improvements to the Land Use Planning Program, and to Ballot Measure 37 administration. Such a policy discussion would be healthy within the forestry community where there is no consensus on these topics, and helpful to ODF staff as it interacts with other agencies, land uses, and interest groups in policy forums. The Board's policy should address the issues of fairness and equity for private landowners, which was a primary driver in the Ballot 37 campaign.

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Issue Description:

I echo the comment in the first bullet under "Forest Vitality" regarding working with OECD to ensure the sustainability and enhance the forest sector's contributions to Oregon's economy. Private landowners need economic incentives to manage for biological diversity and to invest in forest health. Oregon's forest products industry has retooled and consolidated such that competitive markets exist only for a narrow range of species and log diameters. Oregon needs 'right-sized' log processing infrastructure for other species and diameters; secondary/ value-added wood products manufacturers need incentives to purchase locally-produced raw materials. This issue will also have implications for Wildfire Risk Management (e.g., finding markets for small diameter timber) and Forest Regulation (economic incentives for management vs. regulation).

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Issue Description:

Future effectiveness forest practices as part of the Oregon Plan for Salmon and Watersheds.

If we carry out our current forest practices in the state of Oregon, how will forest ecosystems, aquatic ecosystems, and anadromous salmonids change? What are the potential effects of certain but unpredictable events (e.g., major floods, fires)? What are the effects of certain and somewhat predictable human changes (e.g., residential expansion, urbanization, changes in transportation corridors and systems, water availability, demand for wood)? What are the effects of climate change? Several approaches for futuring have been developed in Oregon (Willamette Basin Planning Atlas, CLAMS, Oregon Transportation Analysis, PSU Population Center Projections) and could be developed further for forest-related issues.

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Issue Description:

Forest practices on agricultural, urban, and other non-forestry lands

Many agro-forestry operations harvest their crops at less than 12 years to avoid the restrictions of the Forest Practices Act. The state could work with stakeholders from agricultural and other lands to develop guidelines that encourage more extensive and older forest development to provide the critical ecological and environmental functions of forests. This is particularly critical in floodplains and riparian areas outside of commercial forest lands. This could provide both economic, aesthetic, recreational, and ecological benefits to the land owner and the public.

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Issue Description:

ODF has an inadequate method of providing protection to people in homes at risk of being crushed by landslides.

Here are some changes which would improve the situation:

People who owns homes at the base of high risk hillsides and draws should be automatically notified of logging plans so they can comment. Many people do not even realize their home is in a dangerous location.

The "at risk" area at the mouth of a draw (where a geologist makes a detailed assessment) should be increased from 200' to 400'.

If the homeowner doesn't find out about a logging plan (the current situation in many cases) until logging starts, he should be able to easily halt logging in the area which affects his home and life until the risk is adequately assessed.

The amount of deposit needed to obtain a stay of logging in a life threatening situation should be \$500 rather than \$15,000.

The maximum fine for a life threatening violation of the forest practices act should be \$500,000 rather than \$5,000.

Defination of allowed logging of half of the draw in a moderate risk situation should be better defined. Can the top half be totally clear cut if the bottom is left standing? Seems like a bad idea.

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Issue Description:

Fines for violations should "fit the crime". There should be the potential to have a fine that is 5 times the value of the timber harvested to remove any any temptation to cut valuable timber and just take the fine as a cost of doing business.

Fixed value fines should be indexed for inflation going back to the last time they were changed.

I would like to see more interaction with watershed councils. In the Siuslaw at least, ODF participation has dwindled over the last 5 to 8 years.

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Issue Description:

The Board should provide leadership in crafting the State's position regarding US Forest Service Wilderness in the State of Oregon.

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Issue Description: - Remain non-political Board that uses well supported and verified science/research to formulate policy and regulation

- Foster continued spirit of cooperation and coordination with forest landowners (fire program; forest practices / private and community forests; state lands from a neighbor perspective)
- Support / develop policies and regulations to ensure continued private forestry investments (facilitate active forest management; continue to support regulations that allow landowners to react quickly to changing markets; statewide certification; OSU forestry, forest products, and market research)
- Support OFRI through coordination with, and involvement of, Board of Forestry and ODF
- Encourage ODF to continue communications with other agencies and the public regarding forestry and forest ecosystem dynamics (Lorenson's White Paper, Mormon's comments on the draft ODFW Oregon Wildlife Conservation Strategy)
- Address how to protect working forests from encroachment of non-forest uses (fire risk; conflicting use complaints; vandalism, etc.)
- Facilitate efforts to have Oregon forest practice rules recognized as meeting requirements for federal ESA and CWA
- Provide input to federal agencies to support active fuels management, aggressive fire suppression, and cooperative access in the federal/private forest interface
- Support ODF personnel succession planning, professional development, and training to ensure

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Issue Description

There is increasing statewide interest in finding ways to utilize forest biomass, in both the public and private sector. I would like to see the Board and ODF act as active catalysts in helping to make this happen. It obviously makes sense economically and environmentally, and, according to experts who provided testimony at the recent biomass conference in Bend, not having a guaranteed long-term fuel supply in Oregon available to make this happen is NOT the serious obstacle some imply could prevent this from happening in our state. I encourage our Board and ODF Exec staff to take advantage of opportunities to learn more about this issue by attending conferences like the one sponsored by ODE, US Forest Service, BASE and the Oregon Economic & Community Development Department. It provided a great opportunity to also interact with those from private enterprise, universities and those from other states who are taking advantage of biomass opportunities. The more you know about the topic, the more you ask yourself, "why has it REALLY taken us so long??"

I also encourage the Board and ODF to become more actively engaged in the efforts of the Invasive Species Council. After all, this is a landscape problem and our agency has a responsibility to do our share in supporting statewide efforts. Plus, we are in an excellent position to do so by interacting directly with landowners. This fall, the Council will have a couple of rotational vacancies that will need to be filled. I feel strongly that ODF needs to have a representative serve on the Council. To date, we have been glaringly absent from the collaborative efforts being undertaken to combat this growing problem. I would encourage the department to call ODA and extend interest in serving on the Council. I know this issue is of top priority to forestland owners...they regularly tell me so.

Thanks for the opportunity to share my thoughts.

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Issue Description:

I recently attended a 3-day conference on climate change and implications for Natural Resource professionals in the Pacific Northwest. Conference speakers told the audience that managing forested ecosystems will require us to know more about past, present and future land use, and how these practices affect carbon sources at regional scales.

I would be interested in seeing the Board of Forestry engage in discussion about the topic of climate change and make some recommendations for some on the ground application of management practices that ODF can undertake in its programs of work.

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Issue Description:

Protected Areas - Review the non-timber resources protected by various land classifications on state forest land, and FPA regulations on private land. Begin with a discussion of non-timber resources on the State Forests, then look at the management plan classifications that protect these resources. For private land, just assess the values protected by the FPA. Contract an economist to evaluate the monetary value of these resources.

Integrated Landscape-Scale Forest Management- Look at the role state and private forests play in the larger picture of forestry in Oregon. Get beyond the specific regulations and history. Look at the way tree species composition, rotation times, road networks, etc. have changed over time and what role state and private land plays in the larger landscape.

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Issue Description:

Continue to approve only rules that are based on good verifiable science and that have a reasonable cost to benefit ratio. The same folks that have gridlocked the USFS are now diligently lobbying for more rules on private lands and are not going to stop at the end of this year.

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Issue Description:

The State Forests Program leadership staff (Program Director and Unit Managers) propose the following issues that are listed in two categories: those that are a continuation of the existing workplan, and those that are new workplan issues (not all are state forests specific).

New workplan issues: 1. Forest certification (SFI and FSC); 2. Performance benchmarks and standards for the State Forests Program; 3. Roadless areas on federal lands; 4. OARS - updating of land acquisition/land exchange program; 5. Elliott State Forest - FMP/HCP; 6. Communication: Oregon public trends survey, communication plan, stakeholder involvement, magazine

Continuation of existing state forests workplan items (with some additions):

1. Reconcile the "10-year review" of the FMP; 2. Tillamook Forest Center opening; 3. Watershed effectiveness monitoring; 4. IP Review; 5. Reconciling modeling within ODF/State Forests; 6. BOF intent statements; 7. H&H decision-making framework and follow-up; 8. Systematic Evidence Review

Note: We completed this task with the realization that most of what is in the existing workplan will not be completed until well into May of 2006.

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On behalf of Oregon Small Woodlands Association, I would like to thank the Board for this opportunity to comment on issues for 2006. Our main comment is about the process and time being used in the 2006 scan.

While we understand the need to stay up with the latest developments, we would ask that more advanced notice be given of the scan in 2007 so our volunteer membership can receive, digest and reply to both hard copy and email requests.

The average age of family Landowners is 65 in Oregon; many are not able to log on to the internet or review the amount of material on all the issues sent out. We would suggest that once a person has expressed an interest in a specific part of a priority that they receive updates on that issue via hard mail if necessary. This would potential save time in the long run and make those who have commented feel engaged and listened to.

This would also allow our board to be more prepared with a specific response to issues that are not contained in the very thorough and lengthy documents produced by the department on the boards behalf next year. We will try our best to assign a volunteer to track each issue that the Board has as a priority but we would remind the board of the workload this will place on our volunteers who are already attending many of the committees run by ODF and other agencies.

We would also recommend that some type of ground truthing of comments occurs to prevent a campaign by either non landowner or non Oregon citizens that would adversely affect Family Forest land in Oregon. This may best be done by having Forestry board members attend more local informal meetings with groups such as local OSWA chapters.

We would hope that this issue scan when refined could replace the need for the many committees that currently take up much staff time at ODF, and unjustifiably in our mind, create in some political areas the feeling of a closed door policy.

Finally, there is a growing concern at the apparent lack of clear direction and action being taken over the widening issues that seem to be on the board's plate. Before we take on any new policy issues or PR to try to appease some who continually criticized the work of ODF, we would like to see budgets stabilized for the stewardship positions in the field.

We would hope that this scan will help the board see that the majority of its customers, including family landowners, would like more emphasis being placed on implementing work in forests backed up by sound science.

The need for the department to help stimulate action especially on federal lands and in eastern Oregon to help fulfill the direction given by the Governor is vital. This can be helped if we show a model where active forest management on state and private lands works well.

We would suggest that we focus on those issues for now and do what we can well. We suggest it is time to lead from the front with good science and foresters who have years of on the ground experience. The window of opportunity to take advantage of this human capital with in the department is closing rapidly. We would hope not to see ODF suffer from a analysis paralysis as seems to have happened with USFS.

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Issue Description:

I would hope that the board will readdress the herbicide issue in light of the most recent scientific findings on sublethal effects on not only salmonids but other aquatic species. The State, Federal Govt and local communities have invested many years of energy and resources attempting to restore the functioning of watersheds and salmon runs. Beyond that the issue of the future of potable water must be addressed.

The Siuslaw Watershed Council has a history of successfully partnering with communities and agencies and we are hoping that there will be an increase in communication with our district forester and that we can focus on long term strategizing for forest health/watershed health issues.

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2006 Issue scan input from Oregon Community Trees:

Thank you for giving us the opportunity to share with you and the Board those issues that we feel are important and should be a focus for 2006. The Oregon Community Trees Board of Directors is pleased to see that "Outreach to Urban Populations" is included as one of the seven priorities identified by the Board of Forestry for this coming year. We would like to see the term urban forestry used in conjunction with this priority, either in the title or within the context of the work plan summary.

After reading through the Staff Report by Steve Thomas, we have some additional comments that we hope you will consider adding to any documents produced by the Board of Forestry for interagency and public distribution.

Under objectives one and two, the emphasis is on the Urban and Community Forest Program's mission and the City Survey it completed in 2004. While the mission reflects the breadth of UCFP in general terms and the survey underscores serious issues facing urban communities and municipalities, neither fully addresses other equally important factors integral to urban forestry: air and water quality, benefits to native wildlife, reduction of energy use, alleviation of the urban heat island effect, aquatic health in watersheds, increase in property values, neighborhood cohesion, and traffic calming. Supporting research in these areas is described below:

The aquatic health of our streams and rivers in our region relates directly to the extent of forest cover within our watersheds.¹ The strong relationship between watershed tree canopy cover, water quality, and aquatic health results from the capacity of trees to control the quality and quantity of urban storm water run-off.² Forest cover also supports numerous native bird species. Protecting and restoring the urban forest canopy is one of the most important things we can do to improve the environmental quality of a city, comply with regional, state, and federal law, and safeguard public trust resources.

Researchers and public health advocates increasingly recognize that the presence of urban trees and vegetation in urban communities improves child development, reduces crime,

¹ Booth, D. 1991 "Urbanization and the Natural Drainage System-Impacts, Solutions and Prognoses." Northwest Environmental Journal 7 (1): 93-118. Cole, M. B. 2002. Assessment of Macroinvertebrate Communities in Relation to Land Use, Physical Habitat, and Water Quality in the Tualatin River Basin, Oregon. Prepared for Clean Water Services by ABR, Inc.-Environmental Research Services, Forest Grove, OR, pp. 38. Frady C. Gerth, B., Li, J., and Hennings, L. Portland Benthic Invertebrate Analysis, Metro Regional Services, Portland, OR, pp. 87
² McPherson, G.E., Maco, S.E., Simpson, J.R., Peper, P.J., Xiao, Q., VanDerZanden, A.M., and Bell, N. 2002. Western Washington and Oregon Community Tree Guide: Benefits, Costs and Strategic Planting. Center for Urban Forest Research, USDA Forest Service, Pacific Southwest Research Station, Davis California, pp. 76.

increases local business activity, lowers domestic violence, and enhances mental and physical health.³ For example, consider the role of urban trees in urban air quality. Today a primary concern with urban air quality is the level of airborne particles that is linked directly to asthma rates and human mortality. Trees and vegetation absorb air particulates and other pollutants through the stomata on the leaf surface, a process that improves air quality in cities with widespread health benefits. The structure of trees, both deciduous and coniferous, also serves to adsorb air pollutants such as dust by transferring it to the soil during rain events. One study in the U.K. estimated that doubling the number of urban trees would reduce excess deaths due to particulate pollution by up to 140 per year.⁴

Not surprisingly, extensive research now documents the significant contribution of trees to neighbourhood property values. Research comparing different tree resources with sales prices of residential properties suggests individuals will pay 3-7% more for properties with significant tree resources versus properties with few or no trees. One of the most comprehensive studies based on the actual sales prices found that each large front-yard tree was associated with about a 1% increase in the sales price.⁵ Urban canopies play an important role in reducing ambient temperatures and minimizing the "urban heat island" effect. Energy costs to consumers, businesses, and government agencies can be lowered during summer and winter months with the strategic planting and proper maintenance of trees.

We appreciate the Board of Forestry taking the time to learn about urban forestry issues on your tour last spring. As you observed, our urban forests face a broad spectrum of serious challenges. We urge the Board of Forestry to devote resources to address urban forestry problems and elevate the importance of urban forestry with policy makers. Thank you for accepting our comments.

³ Kuo, F. & Sullivan, W. (May 2001). Environment and Crime in the Inner City: Does Vegetation Reduce Crime? *Environment and Behavior*, 33:3, 343-367, Lyman, F. (August 2002). The Geography of Health. *Land & People Magazine*; Taylor, A.F., Kuo, F.E. & Sullivan, W.C. (2001). Views of Nature and Self-Discipline: Evidence from Inner-City Children. *Journal of Environmental Psychology*, 21; Trees in Business Districts: Positive Effects on Consumer Behavior!, University of Washington; Ulrich, R. (1984). View Through a Window May Influence Recovery from Surgery. *Science*, 224, 420-421.

⁴ Hewitt N. Stewart H. Donovan, R. and MacKenzie, R. undated. *Trees and Sustainable Urban Air Quality*, Research summary from Lancaster University online at <http://www.es.lancs.ac.uk/people/cnh/docs/UrbanTrees.htm>

⁵ Anderson, L.M.; Cordell, H.K. 1988 Residential property values improve by landscaping trees. *Southern Journal of Applied Forestry*. 9: 162-166.

Carolyn Eady
79380 Hwy. 202
Seaside OR 971378
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Email: ceady@pacifier.com

Contact by: E-Mail

Issue Description:

The new method of organizing the key issues for consideration by the Board of Forestry is impressive. It allows the Board to focus their efforts on the most important issues in an efficient process. The listing of these issues, however, has another effect: it clearly demonstrates the number, scope and complexity of their responsibilities.

With the addition of duties related to the Federal forests (as requested by the Governor), I believe the demands on this group far exceeds what is fair or reasonable with the current compensation of \$30 dollars per day plus expenses. It is hard to imagine for-profit boards having more to deal with. How long will the State get the caliber of people we need who are willing (and financially able) to devote the hundreds of hours per year that this position requires, while working in a politically sensitive and highly charged arena? I think the Board of Forestry is in the best position to answer this question.

I recommend that the Board devote some time to exploring the issue of Board compensation or, as a minimum, requesting that the Public Officials Compensation Commission look into it. They need to determine if the compensation for the Board of Forestry is in line with Boards in other States with similar scope of responsibility and workload.

The current Board members may not benefit from this effort, but I consider it their duty to consider it so that the State can continue to attract the caliber of people to serve on the BOF in the years ahead.

Gary Springer Starker Forests, Inc. PO Box 809 Corvallis OR 97339
Phone: (541) 929-2477

Contact by: E-Mail Email: springer@starkerforests.com

Forest Vitality Work Plan - At its July 29 meeting in Warm Springs, the Board was told that public feedback to the draft issue paper on federal forest management was almost exclusively negative. From the letters about the issue paper included in the Board's meeting packet, the gist of the "public" comments was that the Board already has enough to do without meddling in federal forest issues, which is none of the Board's business, anyway.

None of the seven letters were written by people who represent the public. There are certainly groups of constituents that those authors represent, but none of them spoke for the public at large.

The average citizen of Oregon is totally unaware that the Board of Forestry is contemplating becoming more involved in federal forest management issues, or that the Governor has encouraged the Board to do so. So the Board currently has no way of knowing how the public might react to this.

I would encourage the Board to use public polling and public focus groups to begin to gauge public support for proposals in the federal forests issue paper. OFRI has already done some of this work in the past. I also suggest that at the Board's workshop which has been proposed to address federal forest issues, members of the public who have no affiliation with any particular "stakeholder group" should be asked to participate.

This piece of the Forest Vitality Work Plan has some promise, if the Board truly engages the public in it. On the other hand, it holds no more promise than the recent federal "Timber Wars", if the Board only listens to those who have been on the battle lines of those wars.

Dynamic Ecosystems – The brief description of this issue on the back of the "issue scan" form states that the objectives of the work plan "...include increasing scientific understanding of these (natural disturbance) processes, to improve policy-setting and resource-protection strategies". The following questions came to mind, as I read that description:

- 1) How can we mimic important, natural disturbance processes through active management and do so in cost-effective ways, so as to better achieve long term resource-protection goals?
- 2) How do we start changing the "disturbance avoidance" mindset of policy makers, regulators, researchers, landowners, operators, the public, and other "stakeholders"? That mindset, which holds the view that resource protection very narrowly means limiting or eliminating disturbances to water, air, soil and fish and wildlife resources, is deeply ingrained in our forest practices culture.

I think we need to develop a new definition of forest resources protection, if we are to move forward with the "dynamic ecosystems" work plan.

I would like to encourage the Board of Forestry to make this issue of the protection of resources in the context of dynamic ecosystems and actively managed forests a high priority for the coming year. I believe that this may be one of the most important forest practices concepts to come forward in many years. It deserves careful development.

Memorandum

August 8, 2005

To: Oregon Board of Forestry
Board of Forestry Issue Scanning Workgroup

Fr: Susan Ash, Portland Audubon Society
Brent Davies, Ecotrust
Frances Eatherington, Umpqua Watersheds
Laura Etherton, OSPIRG
Noah Greenwald, Center for Biological Diversity
Daniel Hall, American Lands
Les Helgeson, Native Fish Society
Ivan Maluski, Oregon Chapter, Sierra Club
Jason Minor, Oregon Trout
David Moskowitz, Wild Salmon Center
Mary Scurlock, Pacific Rivers Council
Jay Ward, ONRC
Chuck Willer, Coast Range Association
Tom Wolf, Oregon Council, Trout Unlimited

Re: 2006 Issue Scanning Priorities

This memorandum is in response to the request from the Board of Forestry Issue Scanning Workgroup to suggest priority issues that the Board and Department should work on during 2006. The above-signed organizations recognize that priority issues gathered in this scanning effort may result in new work plans, or changes to the seven Board workplans now under development. We look forward to participating in the review and refinement of the Board's priority issues and workplan development.

The organizations listed above represent 54,000 Oregon members who are concerned about how Oregon's public and private forests are managed now and for future generations. After detailed discussion, representatives of these organizations present the following priority issues for consideration by the Issue Scanning Workgroup. These issues are listed in order of priority:

1. **Create permanent reserves to protect Oregon's natural heritage, provide clean drinking water, sustain fish and wildlife populations and provide opportunities for recreation and solace.**

Rationale: We strongly urge the Board of Forestry (BOF) to begin a process to designate permanent reserves on state lands. Achieving compliance with the greatest permanent value rule does not require active management on every acre of Oregon's public forest land, nor does it preclude the use of reserves as a management tool to achieve forest health goals as well as produce clean water and fish and wildlife habitat. Reserves have been consistently identified as an important component in habitat conservation planning discussions designed to secure federal assurances for aquatic species under the

Endangered Species Act. Governor Ted Kulongoski urged the Board to seek a better balance between permanent reserves and sustainable logging from state forest lands (both Common School Fund and State Forestry lands) in a letter to the BOF in June 2004. The BOF should begin the creation of reserves on state lands in the oldest, most complex native stands left on the Clatsop, Tillamook, and Elliot, particularly areas used by murrelets and owls, and including currently designated Salmon Anchor Habitat basins.

2. Independent Scientific Review of the Habitat & Harvest Modeling Effort

Rationale: The expectations among the public, the Legislature, local communities, and public agencies are all riding high on the modeling outcomes of the current analysis of forest stand status, future growth and development of wildlife habitat. While the computer-based statistical effort is cutting edge at predicting stand growth and timber production, we are concerned that the model does not accurately characterize habitat for old-forest dependent or aquatic species. We request that the BOF submit the model for independent peer review by wildlife biologists and aquatic scientists.

3. Analysis of the full range of employment impacts from the forest products sector.

Rationale: Recent economic studies broadly state that non-forest product revenues may equal or exceed forest harvest revenues although these studies fail to quantify the revenue outputs (eg. Hovee Report for OFRI 2004). Further, direct employment tied to forest harvest over-estimates the real job impacts of timber harvest. Employment models rely on obsolete assumptions and have not been updated to reflect changes in forestry related to technology, labor and timber supply. The BOF should conduct both a state-wide and sector-wide analysis of direct timber employment as well as a broader analysis of employment created on state lands that explicitly includes consideration of non-timber economic values.

4. Retain conservation management on the Elliot State Forest

Rationale: The Elliot State Forest is a critical coastal forest within a sea of private land and supports sensitive wildlife such as northern spotted owls which are very dependent on the state forests for connectivity to federal lands where ESA recovery is focused. The BOF should retain the "guiding principle" that is in the Elliott's current FMP which states: "The intent of the plan is to adopt management strategies that contribute to providing for the survival and recovery of currently listed T&E species, and assist in preventing future listings of other species." The BOF's proposed management plan revision for the Elliot State Forest must demonstrate a convincing rationale for diverging from the existing management plan.

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.

DONALD P. ELLSWORTH
Printed name

RANCHER
Affiliation

3303 N VALLEYVIEW RO. ASHLAND, OR 97520
Mailing address, City, State, Zip

1.541.482-3020
Phone number and/or e-mail address

Preferred method of contact: mail e-mail phone

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

4.9.05

GOOD FOREST STEWARDSHIP IS ESSENTIAL
TO MAINTAIN HEALTHY ORE FOREST - THIS WILL
PROVIDE GOOD WILDLIFE HABITAT. WE DO NOT
NEED NATURES DISASTERS TO PROVIDE THIS.
FORESTS NEED TO BE HARVESTED IN A
PRUDENT, SUSTAINABLE MANNER, THAT
INSURES FUTURE PRODUCTION.
URBAN GROUPS OF ENVIRONMENTAL "DO GOODERS"
ALTHOUGH WELL INTENTIONED - HAVE NOT THE
EXPERIENCE NOR EDUCATIONAL PROCESS TO
ADVISE FORESTERS, WHO ARE PROFESSIONALS
IN THEIR FIELD, ON HOW TO MANAGE OUR FOREST.
THE DECIDUOUS UNDER STORY NEEDS TO BE
CONTROLLED TO HELP MANAGE WILDFIRE
PONDS NEED TO BE ESTABLISHED BIG ENOUGH
FOR FIRE RISE IN EMERGENCIES - WILD
LIFE HABITAT ABOUNDS AROUND WATER.
COMMON SENSE IS ESSENTIAL IN ANY
MANAGEMENT ACTIVITY.

LOCKING UP FORESTS & CLOSING ROADS
WILL NOT ENHANCE OUR FOREST NOR
AID IN FOREST FIRE EMERGENCY.
ie "SOON MT WILDERNESS".

IF WE INSIST UPON PROPER STEWARDSHIP
& MONITOR THAT PROCESS, "REGULATIONS"
CAN BE HELD TO A MINIMUM.

WHEN FIRE DOES OCCUR IT IS
ESSENTIAL THAT RECOVERY OF OUR
NATURAL RESOURCE TAKES PLACE AS
SOON AS POSSIBLE - NOT LITIGATED
THRU THE COURTS AS IN THE
PAST - THE STATE OF OREGON MUST
PROVIDE THE PROFESSIONALISM TO
OVERCOME THE LIBERAL GREEN
MOVEMENT TO CONTROL OUR FOREST
LANDS! COMMON SENSE MUST
PREVAIL.

Don Ellsworth



Mr. Donald P. Ellsworth
3303 N Valley View Rd.
Ashland, OR 97520

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.

DONALD GRISSOM
Printed name

Affiliation

541-826-3656

Mailing address, City, State, Zip

2933 South Fork Little Butte Creek, Eagle Point, Or. 97524

Phone number and/or e-mail address

Preferred method of contact: mail e-mail phone

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

To create a viable F.P.F.O. at this late date, one should look at history. When in history were these fires in existence? *After*

The first 75 years of the 21st century. The first and most important thing in containing wild fire is quick response. No matter what

jurisdiction a fire is started in, the first available fire fighters to reach the fire have a far better chance of containment. To

attain the quick response all forest roads should be recommissioned.

The quick response kept the excessive wild fires in control until the loggers, a tremendous work force, were no longer available.

Next, harvest the dead and dying, clear and burn the slash, when not a danger and always leave the roads passable for fire equipment even if public is locked out. Old growth timber is not fire proof or fire

resistant. The *Short* creek fire of 1910 near the head of South Fork of little Butte Creek was and still is proof of that. All the trees to 6 feet diameter were dead. They were still standing in 1945 when I

started grazing the South Fork allotment. I have watched good forest management for many years *Detritus rate* ~~deleterious~~ to no management by the turn of the century. An unharvested crop is a wasted crop. Plant a garden

Continued

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.

Printed name

Affiliation

Mailing address, City, State, Zip

Phone number and/or e-mail address

Preferred method of contact: mail ___ e-mail ___ phone ___

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

(Continued from 1st page.)

or wheat field and observe and learn. Forest is the same with
longer growing season, but must be harvested or wasted.
Burning is waste. Study history and learn. We harvested near the
amount that grew each year. *Till 1990.*

A Fifty Year Grazing Permitee.

Donald Harrison



J & C Belton Treefarms

Sandy Trees Inc

"Growing trees for a better tomorrow"

John & Carol Belton

July 11, 2005

Oregon Department of Forestry
Governing Board

I manage 200 acres of forestland east of Sandy, Oregon. Most of the land has been in the family for over 100 years and my sons (the fourth generation) will soon be assuming the management. One of my sons has taken degrees in architecture from some rather notable universities (UC Berkeley and Harvard).

Promoting Forest Products in the Building Trades:

I have learned from that son and other sources that the architecture schools give little or no coverage of the forest products. Concrete and steel studs are now the "safe" recommendation for the structural components of many of our buildings. "Wood products are considered only for decorative elements on the inside of buildings." I have also listened to builders who are very unhappy with the oriented strand board for sheeting even though the industry has been promoting the product as the top option for sheeting a building. One builder told me that he had to dismantle a complete building and burn all of the oriented strand board because it had soaked up too much moisture in the winter and a mold culture had developed in the walls. I have gotten documents from the department at Oregon State University telling me how much better OSB is than plywood but my small anecdotal information is much to the contrary. If forestry is to contribute to the future Oregon economy we must do a much better job of marketing QUALITY wood products. Why is the industry interested in growing large volumes of fast-growing wood fiber (low quality) and then reconstituting it into an engineered product with resins?

Thank you for your consideration of this matter. Sincerely, John Belton

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.

LYNCH & YVONNE JONES

Printed name

Private rural landowners

Affiliation

725 INDIAN BEND RD, UMPQUA, OR 97486

Mailing address, City, State, Zip

joneslandinq@diracway.com

Phone number and/or e-mail address

Preferred method of contact: mail ^{or} e-mail phone

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

We know little about the intricate workings of the forestry world. What we do feel strongly about is the frivolous, destructive legal maneuvers of the "Green" crowd. We believe they are a minority, but due to their activism, they have managed to become a driving force. We'd like to see a very strong push to put them back under a rock! This goes for Sierra Club, Nature Conservancy, 1000 Friends of Oregon & other groups who have duped useful idiots into supporting their agenda.

Lynch & Yvonne Jones
725 Indian Bend Rd.
Umpqua, OR 97486

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.

Lex Loeb
Printed name
GRAVITY RESEARCH PROGRAM (GRP)
Affiliation
POB 6056, PDX, OR 97228-6056
Mailing address, City, State, Zip
Phone number and/or e-mail address
Preferred method of contact: mail e-mail phone

Lex Loeb
PO Box 6056
Portland, OR 97228-6056
USA

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

I think its time that the state of Oregon clarifies the difference between private and public holdings and assert experimental ideas like stream corridors to public lands leaving much more flexibility to private lands - mostly because the so-called "science" is not proven and subjecting all land to a possible program that could fail in the future is going to result in the waste of all resources, not just some. "sustainability" as presently defined - as "sustainability" is defined in an opposite manner in Sweden - now for over 500 years! Private ≠ public - I hate the fees for public use.

* I want to propose something really new - I discovered that in NW lowlands of Europe that certain NW trees may grow better there than here - I propose - planting experimental forests there to supply lumber demand with Oregon Genetics (CATOO) stock.

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.

Miles Hemstrom
Printed name

USDA Forest Service
Affiliation

PO Box 3890 Portland OR 97208
Mailing address, City, State, Zip

503 808 0206 mhemsstrom@fs.fed.us
Phone number and/or e-mail address

Preferred method of contact: mail e-mail phone

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

Land management ~~and~~ agencies, private land owners, and ODF should have some common tools/language to use in discussing forest policies and effects. ODF should consider building policy analysis and planning models in partnership with the USFS and BLM (at least) to further cohesive approaches. This would allow easier communication about management goals, effects, and the intent of various policy scenarios. It would also leverage scarce human and financial resources.

U.S. DEPARTMENT OF AGRICULTURE
PACIFIC NORTHWEST FOREST AND RANGE EXPERIMENT STATION
P.O. BOX 3890
PORTLAND, OREGON 97208-3890

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, \$300

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.

Steven (steve) E. Grasty
Printed name Harney County Judge
Affiliation 450 N Buena Vista Burns, OR 97720
Mailing address, City, State, Zip 541-573-6356
Phone number and/or e-mail address
Preferred method of contact: mail ___ e-mail ___ phone

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

Oregon was and still could be a timber state. ODF does a wonderful job of managing forests. How about helping the U.S. F/S reach your goals?

HARNEY COUNTY COURT
Office of Judge Steven E. Grasty
450 North Buena Vista
Burns, Oregon 97720

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.

John Griffith

Printed name

Chairman, Coos County BOC, delegate CFTK (thereby member of FTRAC)

Affiliation

250 N. Baxter Coquille 97423 Board member Assoc. of O+C Counties

Mailing address, City, State, Zip

396-3171 x 248 jgriffith@co.coos.or.us

Phone number and/or e-mail address

Preferred method of contact: mail e-mail phone

BOARD OF COMMISSIONERS
250 N. Baxter
Coquille, Or 97423

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

1. ODF needs to get more timber out of state forests & the Elliott.
 - a. Communities & economy need help. State forests + CSch. fund lands are trust lands. The state needs to act as a trustee rather than politics decide
 - b. The variety of wild life needs benefit of forestry, not just older-forest species
 - c. Ore. Forest Practices Act is adequate. ODF exceeds it unnecessarily
2. Tillamook Forest Center is good. Media misinforming audiences is not a problem. Can do much about, apart from doing as it does now - interjecting facts
3. Regarding "sustainability of Oregon forests," it takes sustainable forest communities, forestry infrastructure, harvest & processing industry and appealing job prospects. w/o these, forests are not sustainable. They grow old and burn, or burn early, or decay. The executive branch of Ore. government & State Land Board should be encouraged to increase harvest levels to move closer to sustainable forests & the FPF0 should be amended to accomplish that recommendation
4. "Dynamic Ecosystems" appears to be a good idea
5. The Governor's "broad range of options" to recommend how to manage fed. forests should be balanced more toward communities near those fed. forests. For example, is more near the Mt. Hood forest than Ore. Bayco, so federal sentiments might be more useful as related to Mt. Hood NF Plan. Federal opinions have little to no relevance to timber or salmon NF

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.

Liz VanLeeuwen

Printed name

Former State Rep., Current Chair Linn Soil & Water Conservation Dist.

Affiliation

27070 Irish Bend Ln., Halsey, OR 97348

Mailing address, City, State, Zip

571-369-2544, FAX 369-2800

Phone number and/or e-mail address



ELIZABETH VANLEEUVEN
27070 IRISH BEND LOOP
HALSEY OR 97348-9730

Preferred method of contact: mail e-mail phone

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

If by your definition of "sustainable forestry" you mean the growing and harvesting of timber in a productive and economical manner so there is a continuing supply available, I think I can agree with you.

Applying good forest management practices on public lands and allowing private owners the opportunity to manage their lands in a profitable manner should be your goal.

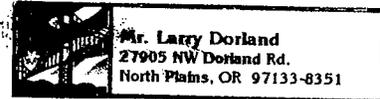
Remember, that certain forests under your jurisdiction were dedicated to providing education funding.

You need to manage in such a manner that both the product and the wildlife habitat (+water protection) do not all go up in smoke.

what is your definition of "sustainability" ???

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.

LARRY DORLAND
Printed name
Oregon Hunters Association
Affiliation
27905 N.W. Dorland Rd North Plains, OR 97133
Mailing address, City, State, Zip
503-647-6842
Phone number and/or e-mail address



Preferred method of contact: mail e-mail phone

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

One of the main goals of the Oregon Hunters Association is helping wildlife by enhancing habitat. This is why we are very interested in the forests of Oregon. We are concerned about the forest-providing habitat for all species. We feel that habitat in many cases has or is not being allowed to exist that is needed.

Reforestation practices in the past has created a monocultural forest not a diversified forest. This practice has not created habitat that is needed for many animal species. Hardwood stands provide some of the needed habitat. The forest practices also have eliminated open areas for grasses and other forbs to grow. In many areas under present practices habitat is being destroyed but new is not being created. I have seen in the past year some changes taking place but is it enough, I am not convinced.

Another concern of the OHA is the food value that is growing in the logged areas. There is some indications that what is growing have very little food value for the large game animals. The animals are eating it but it has the value of "cardboard".

The OHA is aware of the many directions that the State Forests are being pulled but these are our present concerns.

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.

Russ McKinley
Printed name
BOISE CASCADE LLC
Affiliation
P.O. Box 100
Mailing address, City, State, Zip
MEDFORD OREGON 97502
Phone number and/or e-mail address
RUSSMCKINLEY@BOISEBUILDING.COM
Preferred method of contact: mail e-mail phone [↑] no space

Please provide a brief description of the proposed issue [500 words or less] *Comments in priority*

FPFO This is my #1 priority for OSBF. We also ask that you integrate your efforts with the ODF+W Comprehensive Wildlife Program Oregonians can and deserve a clear picture about Oregon forestlands and its wildlife state forest Mgt needs a thorough review to understand why these lands should be managed differently than private lands. What's the benefit and what's the cost (yield and allowable cut) Forest vitality - Current federal plans ensure wildlife habitat is threatened by uncharacteristically intense wildfire and communities adjacent to these lands are economically depressed. What a rotten deal for Oregonians! The state agencies need a unified point of view to federal land managers. Implement your plan! Wildfire Risk management. The ODF is the best and needs to stay that way! Dynamic Ecosystems should be incorporated into the FPFO

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.

Walt Gentis

Printed name

MALHEUR LUMBER COMPANY
P. O. BOX 160, JOHN DAY, OREGON 97845

Malheur Lumber Co

Affiliation

PO Box 160 John Day Or 97845

Mailing address, City, State, Zip

541-575-2921

Phone number and/or e-mail address

Preferred method of contact: mail e-mail phone

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

Comments on Smoke Management: It is my understanding that a site specific burn permit would be required and that a fee would be charged based on estimated tonnage of slash to be burned and the size of the area to be burned would be regulated based on tons of fuel per acre.

We are opposed to these requirements for the following reasons

1. In Eastern Oregon on a normal year we have a very short burning season and it is necessary to take advantage of this short window. The new smoke management requirements would prevent us from completing our slash burning each year creating a backlog that could never be caught up.
2. The smoke management policy might be necessary in heavily populated areas but in Grant County and other parts of Eastern Oregon we have very sparse human populations and smoke from slash burning has never been a problem.
3. We also believe under the smoke management plan that operators may pile their logging and thinning slash but may never burn it.
4. We are not opposed to getting a burning permit to burn slash, however we are opposed to the limiting of size of the area that can be burned at one time and also we are opposed to being charged to burn our slash.
5. We feel that smoke management should not be done with a broad brush approach. We have totally different weather conditions in Eastern Oregon than those of Western Oregon. We have a much shorter window of opportunity than Western Oregon and we also have much less population with most slash burning far removed from population centers.

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.

JOEL NELSON
Printed name
PLUM CREEK TIMBER COMPANY
Affiliation
P.O. BOX 1528
Mailing address, City, State, Zip
COOP RAY, OR - 97420
Phone number and/or e-mail address
Preferred method of contact: mail ^{OR} e-mail phone

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

AS AN ORGANIZATION, WE FEEL THE BOF NEEDS TO CONTINUE TO FOCUS ON THEIR 2004 IDENTIFIED WORK PLANS. THOSE 2004 PLANS COVERED SOME GOOD THINGS OF EMPHASES FROM OUR VIEWPOINTS. ISSUES OR TOPICS IN THESE 2004 PLANS OF PRIORITY WE FEEL SHOULD BE; FPPD, FOREST UTILITY, DYNAMIC ECOSYSTEMS & FOREST REGULATION. THESE ARE IMPORTANT TO OUR COMPANY AS TIMBERLAND OWNERS & MANAGER IN OREGON. IN ADDITION, WE FEEL THE BOF NEEDS TO BE COMMITTED TO "SCIENCE BASED DECISION & RULE MAKING." POLITICS & SPECIAL INTEREST DECISIONS WILL NOT BE BENEFICIAL TO LAND MANAGEMENT & FOREST PRODUCTIVITY. IF ACP'S ARE PURSUED, THERE THEY ARE COSTLY & REDUCTIVE. WE AS PRIVATE LAND OWNERS ARE CONCERNED WITH THE PERCEIVED THEY MAY SET FOR OTHER TIMBERLAND OWNERS. WE ALSO SUPPORT FULL FUNDING & SUPPORT OF OUR

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.

PCAM
Printed name
PCAM
Affiliation
POB 6056
Mailing address, City, State, Zip
POB OR 94228-6056 PCAM@webtv.net
Phone number and/or e-mail address

Preferred method of contact: mail e-mail phone

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

#1. Wild Fire Risk Reduction + noxious weed removal with grazing pack animal herds like GOATS and Access to public lands by individuals with herds with permits would be a nice way to experiment. Parts of the state are already in extreme danger!
#2 Hurry!

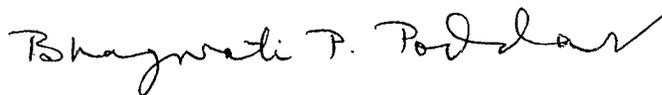
I think ecological groups + preservationists should have to bid on forest tracts suitable for harvest rather than have them gumming up appropriate forestry + the whims of public ownership with lawsuits. Let's also protect the private property rights and not put all forests under capricious political management.

#3 Let's have the state issue permits for hemp plantations as an experiment in fiber production - already overly taxed - let's see if it really works. Hemp comes in hybrid non-marijuana varieties!

To the Board of Forestry:

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.

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?



Bhagwati P. Poddar, Ph.D.

BHAGWATI P. PODDAR

Printed name

NONE

Affiliation

43804 SYLVANDALE LANE, ASTORIA, OR 97103

Mailing address, City, State, Zip

(503) 458-5145

Phone number and/or e-mail address

Preferred method of contact: mail e-mail phone

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.

John A. Rounds
Printed name
Consulting Forester, OSWA (Pres. 1998-2000) member EFCC
Affiliation
8301 NE Mill Creek Rd., Prineville, OR 97754
Mailing address, City, State, Zip
(541) 447-1342 jjrounds@bendnet.com
Phone number and/or e-mail address

John A. Rounds
Consulting Forester

Preferred method of contact: mail e-mail phone

8301 N. Mill Creek Rd.
Prineville, OR 97754

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

1) Forest Regulation - I served on the ERFAC committee. There has been too much regulation for political reasons + not enough based on science. This is especially critical in Eastern Oregon where most of our markets are gone due to an artificial shortage (lack of Federal timber). Now we see large tracts of industry land being put to other uses. You can preach forest mgt. all you want but if we don't see some changes to mgt of Federal land in Eastern Oregon, talk of sustainability will be nothing but hot air. We own and manage 800 acres of timberland and now when we harvest, the markets are over 100 miles away. They used to be 15. The Board has to address the Fed. timber issue in Eastern Oregon, if they want forestry practised on the East Side. You should heed some remarks by Hal Salvasser (ASO), I got from Chris Janner, OFIC.

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George Smith
Printed name

Copuille Indian Tribe
Affiliation

P.O. Box 783, North Bend, OR 97459
Mailing address, City, State, Zip

gsmith@copuilleTribe.or.gov
Phone number and/or e-mail address

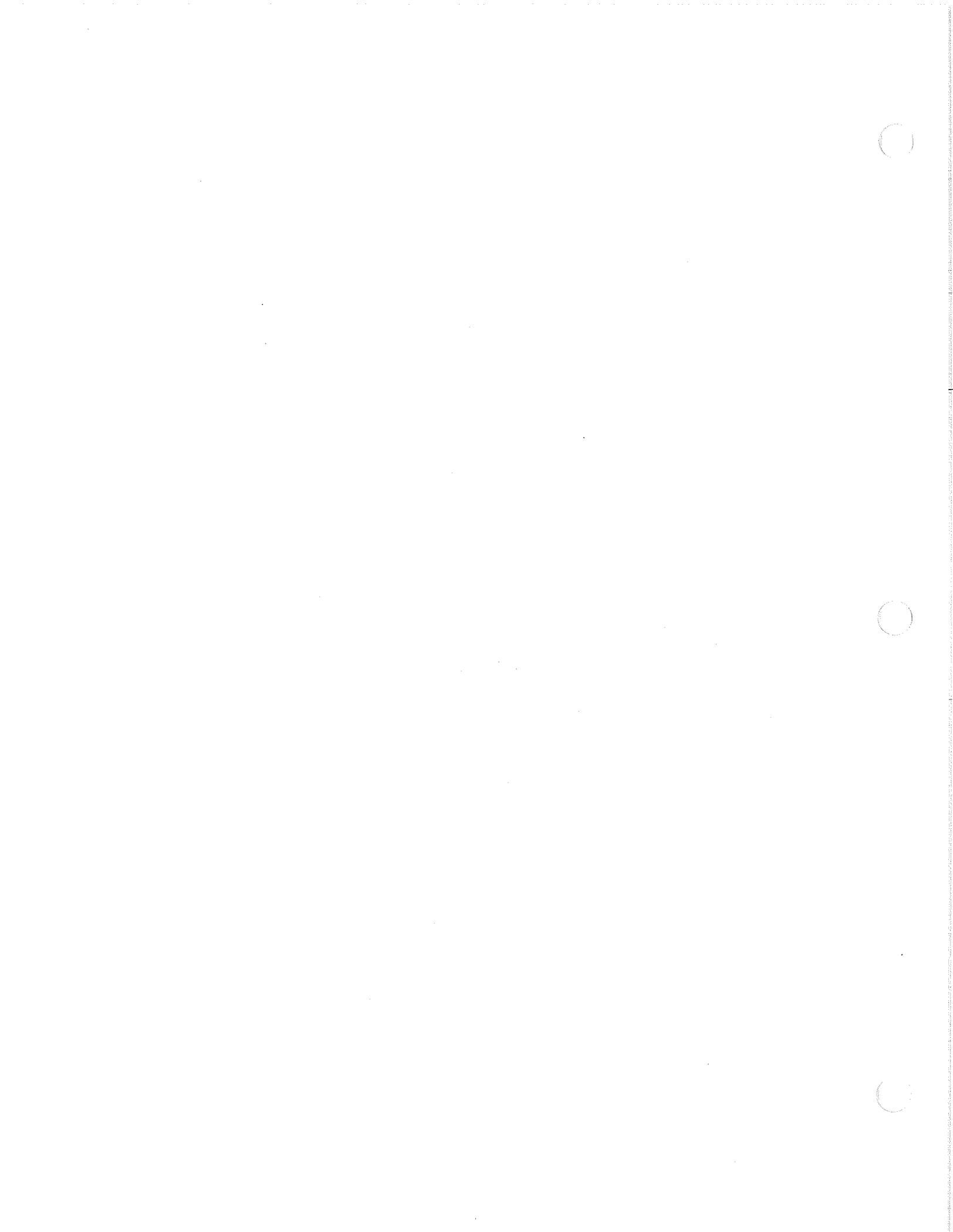
Coquille Indian Tribe
P.O. Box 783
North Bend, OR 97459-0061

Preferred method of contact: mail e-mail phone

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

Logging on unstable, sensitive slopes is an issue of concern, especially for State Forest lands in the OR Coast Range. There needs to be a credible, scientific approach (Model) developed that allows identification of these "high risk" slope areas and some kind of assessment of what kinds of disturbances would be permissible - eg Regener harvesting, Commercial Thinning (to what level of canopy removal and types of allowable harvest methods?). It seems the current methodology for delineating these areas needs improvement and more scientific basis matched with modern harvesting technology.

George Smith
Forest Manager





July 20, 2005

Oregon Board of Forestry
2600 State Street
Salem, OR 97310

Dear Chairman Hobbs and Members of the Board.

Thank you for the opportunity to submit suggestions on forest management for 2006.

Forest Management and Wildfire Risk: As fire planning gets underway, Wildfire Risk Management should be integrated with forest management and Habitat Conservation Plans. Protecting habitat is just as essential as protecting the rural interface areas, as both would suffer catastrophic losses in the event of wildfire. At the very least, thinning and fuels reduction projects should occur in all rural interfaces. Habitat and conservation areas need to be managed to prevent fuel loading where they interface with communities or any other areas at risk of wildfire.

Forest Vitality: The Biscuit Fire should serve as a primary example of what happens when too many policies and categories of federal RMPs are set. Oregon law says that reforestation must occur. If our laws aren't clear enough for the federal government, perhaps we should include fire (along with harvest) as a means of deforestation that requires the restoration components of salvage and reforestation. Federal laws, rules and policies do not supersede state laws. (This is reiterated in US Code and the Code of Federal Regulations.) Jurisdictional authority resides within the State and it's up to the State to assert that authority.

Outreach to Urban Populations: Good idea. PL 106-393, Title III funding has allowed counties to establish After School Forest Education programs. This could be easily expanded with some additional funding from ODF to include target urban areas. Counties have made a major contribution of Title III funds to the Tillamook Forest Center. Forest Education programs are currently underway in most Oregon counties and a cooperative effort on your part is the most efficient way to approach this. (Contact Associated Oregon Counties for more information.)

Forest Regulation: The non-regulatory means of encouraging landowners to protect habitat should be well thought out before implementing. Coos Soil and Water Conservation District is dealing with the negative impacts of Conservation Easements and habitat protection in wetland development and is currently constructing corrective measures with Division of State Lands. Easements and conservation measures are a property right; but they should not impair or encumber adjacent landowners with additional buffer zones or forest management restrictions. Habitat Protection has become synonymous with *unmanaged* lands. All forest lands need to be managed to some degree and forest management plans should be a mandatory component of all conservation areas established on private lands, including monitoring for compliance.

I would like to see the next topic added to your list of forest health issues:

Wildlife Damage: Rural forested areas in Coos, Douglas and Curry Counties (possibly many others) are being hit hard with bear damage to timber. Cormorant perching is killing residual growth timber around the estuary of Coos Bay. Wildlife damage must be managed. State agency budgets for Wildlife Services have been cut leaving the cost burden to counties. We need help. Timber mortality is increasing due to wildlife damage and the problem will continue to grow if measures aren't taken to allow us to meet the demand for assistance.

In closing, I would like to suggest that the "broad range of groups" discussing these issues who are urban or non-timber professionals attend your Forest Outreach Education program prior to a seat at the table. Educated diversity can achieve a cooperative goal. Ignorance can be counterproductive.

Sincerely,



Helen Franklin
(Pacific Timber Marketing Agency)
PO Box 1237
North Bend, OR 97459
(541) 756-1480

Director, Timber Liaison, Coos Soil and Water Conservation District
Vice Chair, Coos County Weed Advisory Board
Category II, Coos Bay District BLM RAC

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.

Amy Amuroso
Printed name
Dir. of Natural Resources - Cow Creek Band of Umpqua
Affiliation
2371 NE Stephens Roseburg, OR 97470
Mailing address, City, State, Zip
aamoroso@cowcreek.com
Phone number and/or e-mail address

Preferred method of contact: mail e-mail phone

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

I am interested in seeing better coordination with federal land management agencies. Such as the forest service + BLM.

finding one common goal and working together on it.

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.

Printed name Tom Steinberg

Affiliation _____

Mailing address, City, State, Zip 1830 Washington St Eugene, OR 97401

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

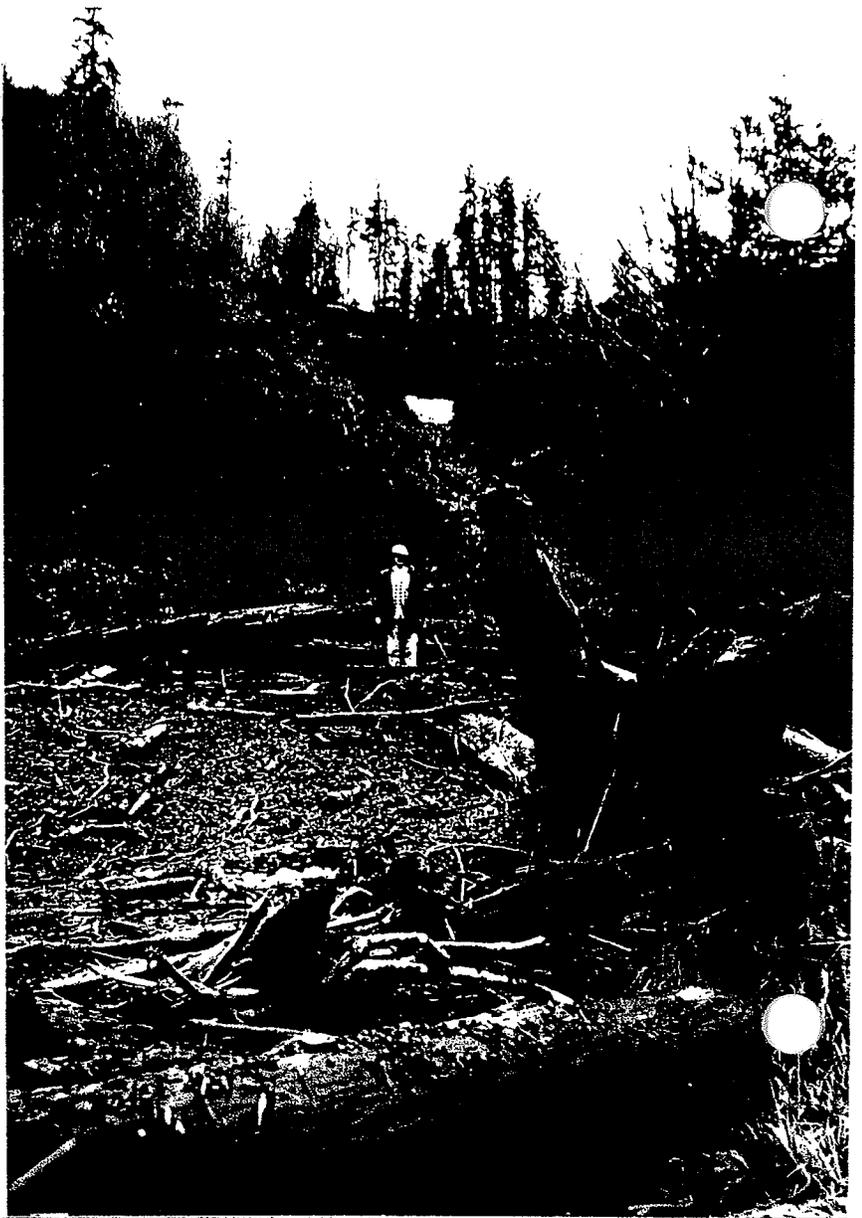
The amount of deposit need to obtain a stay in this situation should be \$500, not \$15,000.

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

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"

July 21, 2005

Tom Steinberg
1830 Washington Street
Eugene, Oregon 97401

Nancy Nichols
93849 Deadwood Creek Road
Deadwood, Oregon 97430

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.

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



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

**OREGON
FOREST
INDUSTRIES
COUNCIL**

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Phone
503/371-2942

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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

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

Paul H. Dunn, Assistant Station Director

Printed name

USDA Forest Service, Pacific Northwest Research Station--Station Director's Office
Affiliation

P.O. Box 3890, Portland, Oregon 97208

Mailing address, City, State, Zip

503-808-2115; pdunn@fs.fed.us

Phone number and/or e-mail address

Preferred method of contact: mail e-mail phone

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

1. Expand the "Outreach to Urban Populations" to include gaining a better understanding of shifting public values for forestlands. Engage with those concerned about the interactions of forest management and neighboring communities. Some of these interactions continue to generate policy interest (for example the wildland urban interface discussions among the fire community, the socioeconomic aspects of the sustainable forestry discussion).
2. Under the heading of "Forest Vitality" add a bullet to mention Water.
3. Areas relating to "Forest Vitality," "Outreach to Urban Populations," "Dynamic Ecosystems," and "Wildfire Risk Management," are particularly important to both agencies. Historically the agencies have supported each other in collecting base data (such as Forest Inventory or CLAMS). We are on the verge of developing indicators of change (Oregon Benchmarks for land development or Fire Risk) and this needs to continue to be encouraged until a full suite of indicators are developed. Also increased collaboration on analysis of the base data on issues such as Biomass, Sustainable Economic Development, and indicators of risk is important and needs to be stressed in the next few years.
4. Under the heading of "Dynamic Ecosystems", the PNW Station endorses the objective of increasing scientific knowledge of processes such as landslides and blowdown that may play an important role in ecosystem function over the long run to improve policy setting and resource protection strategies. These could be potential areas for collaboration/cooperation between PNW and ODF.

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Jack Drinkwater
Printed name
Harney County Commissioner
Affiliation
72155 Hwy. 395 N Burns, Ore. - 97720
Mailing address, City, State, Zip
541-573-6284
Phone number and/or e-mail address
Preferred method of contact: mail e-mail phone

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

Our forest is a crop. Our forest is a renewable resource and should be managed that way. On a sustained yield basis you can log forever. To let our forest die from bug kill and fire is ridiculous. To let timber rot after a fire is a waste of our money. Salvage logging should begin immediately. Also the old wives tale about old growth timber being disease and fire resistant is boloney. When a tree flattens out on top it has reached its life span and should be harvested. Keeping old growth trees is like trying to in the cow business and never keeping a replacement. Reifs. I have spent my life in the Malheur Forest. My family started running cattle then before there was a Forest Service. More than 130 years. I know something about our forest.

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.

Ron Ring
Printed name

(retired forester)
Affiliation

2200 Hillcrest St., Medford OR 97504
Mailing address, City, State, Zip

541-858-8809
Phone number and/or e-mail address

Preferred method of contact: mail e-mail phone

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

To be written into Forest Practice Act:

Title: For Tributary of Oregon Streams and Seasonal Stream Used by Coho and Steelhead for Spawning

- I**
- A. Streams**
 - 1. Cable yarding across live streams – full suspension
 - 2. Intermediate or seasonal cable yarding – one end suspension
 - B. For tractor or skidder yarding**
 - 1. Live streams – not allowed
 - 2. Intermittent or seasonal – one end suspension
- II**
- A. Logging plan and ground control presented to state forester prior to logging**
 - A. Landing marked and located on map**
 - B. Skid trails marked and located on ground prior to any harvesting**

- Example:**
- 1. Use of culverts in live streams temporarily forbidden
 - 2. Use of logs laid in live streams forbidden
 - 3. Use of railroad flats forbidden except as part of truck hauling road
-
- 1. It would help if State Forester recognized the need for sediment and debris control on harvesting site and adjacent land.
 - 2. Also that fish are in water large or small, that run year around.
 - 3. That timber owners do not have the right to destroy watershed natural water run off systems.

August 4, 2005

To: Oregon Board of Forestry

Re: Forestry Program for Oregon

From: Pat Grimstad
1891 Yaquina Bay Road
Newport, Oregon 97365

541-265-4600
email: glamgram@casco.net

In addressing the Governor's hope for a broad range of groups to develop a unified vision of federal land management, I hope you will include experienced, "old time" loggers, tree farmers, and woodsmen who understand first hand stewardship and protection of our forests and that includes harvesting of timber.

Keywords in the current work plans include "new scientific information", "scientific understanding", "Habitat Conservation", and "resource protection strategies". New theories need to be balanced by those tried and true experiences that have been successful in the woods over the decades.

Nowhere in the plan is there a reference to sustainable harvesting of trees. Non-political thinking in developing a sound forest policy directed by a careful stewardship of our most precious resources, not rabid environmentalist philosophies, is to be greatly desired.

We desperately need sound productive timber harvesting and its related industries to restore Oregon as a leading lumber producer in the U.S.A. and the jobs that go with it for Oregonians.



WEST COAST LUMBER INSPECTION BUREAU

August 2, 2005

Donald A. DeVisser
Printed name
West Coast Lumber Inspection Bureau
Affiliation
P.O. Box 23145 Portland, OR 97281
Mailing address, City, State, Zip
Phone: (503) 639-0651 e-mail: devisser@wclib.org
Phone number and/or e-mail address
Preferred method of contact: mail e-mail phone

Mr. Stephen Hobbs
Oregon Board of Forestry
2600 State Street
Salem, OR 97310

Dear Mr. Hobbs,

I wish to bring before the Board of Forestry an issue might best fall under the Outreach to Urban Population Work Plan, but may go well beyond that. The issue concerns the preference that some (possibly all) of the more popular "green" building standards give to wood from certified forests. An example of this preference is the Leadership in Energy and Environmental Educate Design (LEED) standard that was developed by the United States Green Building Council. LEED is possibly the most popular of the "green" building standards and awards credits to building owners and designers that follow the recommended LEED protocols. The LEED section on Wood only awards credits to wood that has been harvested from forests certified by the Forest Stewardship Council. This practice of awarding wood from certified forests with special points or credits may put forest products produced from timber originating in Oregon's State Forests at a market disadvantage merely because the forest is not certified.

West Coast Lumber Inspection Bureau (WCLIB) has been involved in writing of ASTM International, Incorporated (ASTM) standards on sustainability that are currently being developed in the ASTM Committee on Performance of Buildings (Committee E06). One standard, ASTM E2129, contains a list of questions that are intended to aid designers in specifying sustainable materials. One question in the wood section was initially worded so only wood from certified forests was recognized as sustainable. WCLIB worked within the ASTM consensus process to get the question changed to include wood from "forest managed for sustainability according to the guidelines of a recognized certification program, third-part management program, or government regulations." During this process, WCLIB received valuable assistance from the Oregon Forestry Department staff in the form of research and information that supported the proposed change.

Presently another ASTM committee, the Committee on Wood (D07), is forming a new sub-committee on forests. The primary focus of D07 is the development of ASTM standards for forest products and not the forest, however, there many forest products companies that are active members of D07 who have shown support for forming the new sub-committee. As chairman of this new sub-committee, it is my intention to write a new ASTM standard that outlines the primary characteristics of a sustainable forest using the Montreal Process as the model. Such a standard could be referenced by the developers of green building standards and move them away from defaulting to certified wood as the only source of sustainable wood.

West Coast Lumber Inspection Bureau
August 2, 2005
page 2 of 2

My request to the Board of Forestry is that the Board recognizes the preference of certified wood in green building standards as a potential market threat for wood from Oregon's State Forests and permit the support from Forestry Department staff in the collection and dissemination of information regarding the attributes of a sustainable forest.

Thank you for this opportunity to present my comments.

Sincerely,



Donald A. DeVisser, P.E.
Technical Director

cc: Brad Shelley - WCLIB

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.

Printed name Wayne Naillon
Affiliation Portland United Mtn Pedalers / International Mtn Bike Assn.
Mailing address, City, State, Zip 2147 N.E. 15th ave Portland, OR 97212
Phone number and/or e-mail address 503-284-4892

Preferred method of contact: mail e-mail phone

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

Perhaps the best way to increase acceptance and build support for FPFO is to provide opportunities for a backcountry, sanctuary experience, in the State Forests. Urban residents of the Willamette only see heavy motorized recreation and sivilculture activities on our state lands.

Hikers and Mtn Biker's would like parity with the motorcycles and quad's; the same number of miles of trail within 10 to 15 years.

The South Fork crews do great trail construction. And their cost is hard to beat! Non-motorized trails are being completed at a snails pace.

Maybe a ODF non-motorized trail Czar should be created. More non-motorized recreation staff need to be hired. A much more cost effective way to build good will than the "Forest Logging Ctr

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.

John Lynne Breese

Printed name

Eastside landowners, EOFPA, OSWA, Society for Range Mgmt.

Affiliation

3315 SE Paulina Hwy., Pineville, OR 97254

Mailing address, City, State, Zip

541-447-6762 jlbreese@prinetime.net

Phone number and/or e-mail address

Preferred method of contact: mail ___ e-mail ___ phone ^{evening} any X

Please provide a brief description of the proposed issue [500 words or less] 450 words!

Issue: Save eastside watersheds, from ridge to ridge:

The function of any watershed is to capture, store -- and safely release water. This can only be done when soils are in proper functioning condition. Eastside watersheds are at risk due to juniper encroachment, pine encroachment in upland meadows, and increasing small wood in the forest.

→ As juniper stands gain advantage on site, the grasses, forbs & shrubs that have root systems to hold soil in place, are lost. When they are gone, soil erodes; water is not captured. In 1938, juniper canopy was 360,000 acres; today, 6,000,000+ acres, increasing at 3% per year. Is it already too late?

→ Pine encroachment into upland meadows? Heresy! Then, we saw it on our ranch. For the ecosystem, that is unacceptable. Harvesting trees to save the meadow will mean a clear-cut. H-m-m-m!

→ For a variety of reasons, there is a rapid increase of small wood in the forest. The ability to manage eastside forests, economically and sustainably is virtually lost. Our goal is to "take the worst, leave the best". We just hauled a load of wood to Gilchrist, our nearest mill, approximately 180 miles roundtrip. Fuel is \$2.35 per gallon. Insurance has tripled because fewer companies insure small operations. The receipt, before costs, will be \$520.65. To get that load on the truck, we had used chain saw, tractor, processor & forwarder, in order to put the "lightest foot" on the land. How long can we do this???

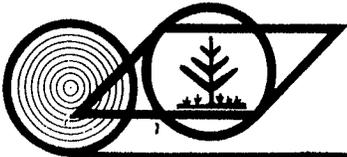
There must be a sustainable infrastructure to economically use small wood and juniper. When economics are not there, ranchers are lost. Developers descend. (We receive an inquiry a month). Houses, asphalt drives and landing strips surrounded by juniper, don't support a functioning watershed. Non-industrial landowners need the support to safely burn, on the range or in the forest, that juniper and small wood which cannot be used.

Acknowledge, that on the eastside, forest and range function together in the same watershed. Each is important. Foresters and range managers cannot be isolated. Support partnerships that work.

We suggest that the Board and ODF actively explore infrastructures to utilize small wood and juniper. Fire reduction in the interface is important. But, with systems that could use the wood, the wood could be productive. People could have year-round jobs. As starters, encourage (now) the Department of Corrections to use biomass for energy in the to-be-built Madras prison. Prisoners could collect the wood! Urge cities to look at biomass for heating public buildings. Look at Darby, Montana.

When watersheds lose their capacity to capture, store and safely release water back into the ecosystem, the system will be lost. Once lost, can it be regained? Would that be our legacy?

John Lynne Breese



LONE ROCK TIMBER CO.

P. O. BOX 1127 • ROSEBURG, OR 97470
TELEPHONE 541-673-0141
FAX 541-440-2516 or 541-440-1573

August 2, 2005

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

To: Oregon Board of Forestry Members

Lone Rock Timber Management Company (LRT) appreciates the opportunity to comment on the Board's annual "issue scan" process. LRT is a family owned forest management company responsible for 115, 000 acres throughout southwest Oregon. LRT employs over 90 individuals.

The existing work plan is an extensive list of challenging tasks for the Board and Department to tackle. Upon reviewing this plan, several items stand out as important for the Board to prioritize.

The forest regulation work plan is an integral component capable of significantly impacting everyday operations. The approach taken by the Board thus far has been extremely thorough and appreciated. As a landowner who has worked with incentives currently provided for in the Forest Practices Act (FPA), I encourage the Board and the Department to continue work further developing incentives and other non-regulatory means to achieve desired outcomes for public benefit. The flexibility and effectiveness of the FPA sets it apart from other regulatory mechanisms.

It has been encouraging to see the Governor recognize the impact the lack of Federal forestland management has had on the State. I would like to see continued work from the Governor's office addressing the State's vested interest in the management of Federal lands in Oregon. However, I do not find this to be an issue for the Board to address.

An issue not addressed in the Board's current work plan is invasive species. Invasive exotic species continue to move into Oregon forests. Coordination between the ODF and Department of Agriculture would work to reduce this problem. Direction and guidance from the Board to develop such a program would go a long way to improving conditions in the woods.

Again, thank you for the opportunity to provide our thoughts. If I can be of any further assistance, please do not hesitate to ask.

Sincerely,

LONE ROCK TIMBER
MANAGEMENT COMPANY

Jake Gibbs
Forester



Seneca Sawmill Company

Highway 99 North at Airport Junction

Post Office Box 851
Eugene, Oregon 97440-0851

Phone (541) 689-1011
FAX (541) 689-6509

August 5, 2005

Via Facsimile (503) 945-7212

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

To: Oregon Board of Forestry Members

Seneca Sawmill Company and Seneca Jones Timber Company ("Seneca") appreciate the opportunity to comment on the Board's annual "issue scan" process. Seneca employs approximately 280 people who manage our timberlands and employ the most up-to-date technology in processing timber into lumber products used primarily in the homebuilding industry in the United States.

Seneca strongly encourages the Board to continue its efforts in providing a viable environment in which to practice forestry on private lands here in the State of Oregon. Key to this are the regulations of the Oregon Forest Practices Act. These regulations have evolved with time as sound science has shown the need for change. We support this science-based approach and ask the Board to continue its involvement in studies, such as Hinkle Creek, that help maintain this policy. There also continues to be a place for ODF to use non-regulatory or incentive-based means to encourage private landowners to achieve public benefit, such as instream habitat improvement.

Wildfire management is also a vital component to the health of our forests. We recognize the continued outside pressures to review funding of these efforts. However, it is important the Board supports the sharing of these costs between private landowners and the general public as the benefits of these efforts accrue to both. We've established a very successful system, one that deserves our continued support.

Oregon Department of Forestry
August 5, 2005
Page 2

Harvest from State lands benefit many Oregonians. To this extent, we encourage the Board to seek a sustainable harvest approach when completing their forest plans. Oregon's future is largely dependent on the success of our school systems, which are largely supported by these timber revenues.

Lastly, we ask the Board to continue to explore ways to have lands managed under the Oregon Forest Practices Act certified sustainable. We feel this has real merit under existing certification systems such as AF&PA's Sustainable Forestry Initiative and the American Tree Farm System. Products manufactured from these forests could then qualify for sustainable certification in their finished form, such as lumber or plywood. This virtually eliminates the cumbersome issue of "chain of custody" required by most certification systems.

Thank you for considering our comments.

Sincerely,



Richard T. Re
Sr. Vice President - General Manager
Seneca Jones Timber Company Limited Partnership
Seneca Sawmill Company, General Partner

rc



HAMPTON TREE FARMS, INC.

PO Box 2315
Salem, Oregon 97308-2315
Telephone 503.365.8400
Fax 503.365.8900
www.HamptonAffiliates.com

August 5, 2005

Mr. Stephen Hobbs, Chair
Board of Forestry
Oregon Board of Forestry – Board Support
2600 State Street Building B
Salem, Oregon 97310

Dear Chair Hobbs:

I believe the highest priority work items for the Board of Forestry (BOF) to address should include those dealing with the problems with timber supply, and the inevitable downsizing of Oregon's forest products sector if harvest levels on our public lands do not increase. I believe it is imperative our state forests produce sustainable timber harvest volume at least as high as predicted when the current forest management plan was approved in January 2001.

To the extent possible, I would also like to see your Board collaborate with similar boards in adjoining states, along with our elected state officials to convince Congress of the need to pass legislation that will allow active management of our federal forests. The non-management of our federal forestlands is putting adjoining state and private forests at increased risk of loss due to catastrophic wildfire, disease, etc. Our rural communities and healthy forest conditions depend on a vibrant forest products sector. Adequate timber supply is essential for our state's forest industry to effectively compete in the global economy and to provide the full measure of its potential to improve Oregon's livability and economic well-being. Thank you for the opportunity to provide this input.

Sincerely,
HAMPTON TREE FARMS, INC.

David E. Ivanoff
Vice President-Resources





Associated Oregon Loggers, Inc. • 1127 25th St. SE, P.O. Box 12339, Salem, OR 97309
503/364-1330 • fax 503/364-0836 • email: aol@oregonloggers.org

July 29, 2005

Oregon Dept. of Forestry, Board Support
Stephen Hobbs, Chair
2600 State St. Bldg. B
Salem, OR 97310
c/o Dan Postrel, email: dpostrel@odf.state.or.us

Subject: Board of Forestry 2006 Work Priorities – Issues Scan

Dear Steve,

I am writing on behalf of Associated Oregon Loggers, Inc. (AOL), to express our interest in Board of Forestry activities and to comment on the Board's annual "issue scan" process.

AOL represents more than 1,050 member logging and allied forest management businesses working statewide—Oregon's forest professionals. These forest professionals employ approximately 10,000 workers in the continuous improvement of operation technology for the sound management of the state's abundant & renewable forest resources. AOL member companies are stakeholders in actively conducting forest management of Oregon's public & private forests.

EXISTING ISSUES

AOL has been engaged with the Board during the initial issue scan and development of work plans over the past several months. We believe that the Board and Department have identified through their work plans a full plate of issues to address in the coming year.

We are interested in all the work plans in progress. AOL has in the past, and will continue to make suggestions and voice concerns on the Board's plans and agenda matters. Specifically, AOL appreciates the opportunity to work with Paul Bell in crafting the Forest Regulation Work Plan. Additionally, the Forest Vitality Work Plan is a work in progress that promises to redress Board participation in shaping future policies surrounding federal forest land management, biomass utilization, and forest sector economies.

NEW ISSUES

Proposed issue #1: Invasive species management

AOL proposes that the issue of invasive species management is included in one of the work plans. The best fit would seem to be the Forest Vitality Work Plan. 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 Dept. of Agriculture to manage across jurisdictional boundaries the existing problems of invasive species. Species of concern would be in two

categories. First, it's important to prevent and/or contain any introduction of new exotics that harm commercial tree species, wood products, or compete with trees—making their management more difficult or costly. Secondly, it's important to control and/or eradicate existing populations of exotics that harm commercial tree species, wood products, or compete with trees—making their management more difficult or costly. In either case, the cooperation among landowners, agencies, and local governments is essential to develop, implement and monitor cost-effective treatments strategies & tactics. The Board and ODF have a role to coordinate policy for forestlands.

Proposed issue #2: Improved industrial fire data collection, for specific forest operations

AOL also proposes that the issue of data collection for industrial fires is included in the Wildfire Risk Management Work Plan. An improved record of statewide industrial fire data is needed to assure that forest operator and landowner fire prevention resources are effectively allocated to those specific machinery or methods having the highest probability of fire ignition and escape. At this time, we believe that there is insufficient history of reliable, credible fire source records, which clearly demonstrate which specific industrial practices result in fires [ignition, escape, suppression cost, resource damage cost]. Without such data, it is impossible to conduct a benefit/cost analysis to determine if precaution measures are effective and efficient.

For example, there is anecdotal "history" that cable yarding is a source of industrial fires; but, there is an insufficient data record to evaluate what element[s] of cable yarding are the greatest [or least] hazardous functions that warrant more [or less] prevention effort/expenditure. Current fire prevention regulations result in millions of dollars in lost production, due to precautionary shutdowns annually. This is a fire prevention issue worthy of Board addition to their Wildfire Risk Management Work Plan. The Board and ODF have a role to collect and report statewide forest fire data, concerning specific causes and consequences.

Thank you for the opportunity to comment. If there is a need to further explain these suggestions, please don't hesitate to contact me.

/s/ Rex D. Storm

Rex Storm, CF

Forest Policy Manager

Associated Oregon Loggers, Inc.

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.

Adam Novick

Printed name Private landowner and master's degree student in Environmental Studies, UO.

Affiliation 3715 Donald Street, Eugene OR 97405

Mailing address, City, State, Zip V: 541-345-0467 E: anovick@uoregon.edu

Phone number and/or e-mail address

Preferred method of contact: mail e-mail phone

Thank you for inviting comment. As a private landowner interested in conserving the Willamette Valley's oak savanna, and as a graduate student studying public policy to conserve anthropogenic ecosystems on private land, I encourage the Board to explore policy to conserve dynamic ecosystems, either as an issue on its own or in conjunction with the issue of regulation vs. volunteerism.

I hope that oak savanna might help shed new light on both of these issues, by offering an opportunity for potential policy efficiencies. In particular, for oak savanna and other ecosystems that are on private land and whose survival apparently depends on active management, I encourage the Board to explore the possibility that given realistic limits to public funding, the greatest conservation of these ecosystems might be provided by adopting a primary strategy to protect the conservation market for them.

By conservation market, I mean the voluntary provision of biodiversity with the right of private parties to fully own it. Studies show that a substantial percentage of nonindustrial private landowners value environmental amenities and are willing to self-provide wildlife habitat, by voluntarily conserving and maintaining it. Also, some governments and public and private agencies are actively encouraging landowners to maintain oak savanna, and are seeking its purchase for permanent conservation.

While voluntary conservation is obviously inadequate to conserve biodiversity at desirable levels, I find that on private land, the regulation of oak-associated species risks exacerbating the loss of oak savanna, by inadvertently discouraging its maintenance. Unlike regulation based on slope, distance from streams, or other criteria, regulation based on the presence of species can alienate private landowners from native species, by turning wildlife habitat into a financial liability. The mere risk of increased regulation can lower the market value of land.

Some conservationists argue we can't reduce regulation without increasing incentives. However, they apparently assume that increasing regulation of species will provide net ecological benefit. For these ecosystems on private land, I find that evidence suggests it could instead cause net ecological harm.

Some also suggest that government can somehow balance such regulation with incentives, like carrot and stick. I find that

this is unrealistic, and that the mix is more like brakes and gas.

A strategy to protect the conservation market for oak savanna would meticulously seek to avoid penalizing its ownership or maintenance. For example, such policy might (a) openly refrain from regulating oak-associated species on private land, and (b) ensure that decisions to upzone property are blind (if not favorable) to the presence of these species.

I believe such a strategy would coincidentally recognize present de facto policy, in which increased regulation of private land is apparently limited by political opposition to its distributional consequences. Such policy might also make existing incentives more effective and avoid the public expense and political conflict of possibly futile and counterproductive enforcement efforts.

I offer some specific suggestions for exploring such policy:

1. Clarify policy goals. (a) Clarify whether the primary objective of conservation policy is to conserve biodiversity or open space. From ODF's workplans, I gather that the Board's primary objective is to conserve biodiversity, and I understand it is also the objective of the Endangered Species Act. (b) Distinguish between conservation (a goal) and regulation (a potential strategy to achieve goals); the word "protect" tends to confuse the two.

2. Recognize that there are different types of regulation, some arguably more effective than others, and that (as ODF's workplans note) policy can sometimes backfire.

3. When considering alternative strategies for conserving these ecosystems on private land, consider protecting the conservation market as a primary strategy.

4. Coordinate policy with other state agencies and USFWS. USFWS has already taken some steps to adapt the ESA to dynamic ecosystems on private land, through exception programs. However, I find these programs need further change to address serious flaws: USFWS risks discouraging participation by demanding concessions from participating landowners; the agreements impose a heavy administrative burden; and options narrow as additional species become listed. Without coordination of state and federal policies, landowners remain in jeopardy for trying to conserve or maintain such ecosystems.

Thanks again. Please forgive my excessive word count.

4 August 2005

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

To: Oregon Board of Forestry Members

Roseburg Forest Products (RFP) appreciates the opportunity to comment on the Board's public issue scan for 2006. RFP owns and manages approximately 450,000 acres of timberland in southwestern Oregon and directly employs over 3,000 forest sector workers.

Issue

Oregon's role in global forestry: a review and recognition of the effects that state regulations and practices have on global forest practices.

Oregon's highly productive forests and environmentally sound forest practices have the potential to support increasing global demands for wood products. However, increased regulations and conservative rules or guidance that are not based upon defined, credible scientific needs may cause unintended consequences. Consideration should be given to the trade-offs of emerging science in forestry and the reduced productive capacity as a result of arbitrary restrictions. Not only may wood removal shift to international regions with less-stringent forest practice rules or no environmental considerations, but there may exist the potential to overprotect our targeted resources (e.g. increased stream buffers may actually reduce fish productivity by limiting food supplies). Minimal harvest of public forest land will also drive wood production to other regions.

In addition to protecting the global environment, the maintenance and increase of wood supply from Oregon will also provide economic stability to citizens and communities within the state. Public understanding of the global environment as it relates to wood supply is essential to public acceptance of science-based, sustainable forest management in Oregon.

Possible items to be addressed in the report

- *Wood products usage in Oregon, the United States, and globally
- *Import / Export for Oregon and the United States
- *Global shifts in wood supply as a result of Oregon supply increases or decreases
- *Identity of international wood suppliers and their current and potential capacities
- *Review forest practices in these areas/countries
- *Estimate future Oregon, United States, and global wood demands
- *Create dynamic picture of global wood movement and potential environmental impacts over time

Board of Forestry Strategies addressed by this topic

Strategy B. Ensure that Oregon's forests provide diverse social and economic outputs and benefits valued by the public in a fair, balanced, and efficient manner.

Board Actions:

B.1. The board will work with other organizations to create and maintain a favorable *investment climate* for environmentally sensitive, socially responsible, and *globally competitive* forest-based businesses throughout Oregon that will generate high quality, value-added products; high quality, *stable employment*; and *increased export capacity*. (KEY ACTION)

B.2. The board will promote the development of programs that enhance Oregon's forest industry competitiveness, industrial development, and both *in-state and global recognition that Oregon forest products come from sustainably managed forests*. (KEY ACTION)

Strategy C. Maintain and enhance the productive capacity of Oregon's forests to improve the economic well-being of Oregon's communities.

Board of Forestry Visions addressed by this topic

1. Healthy forests providing a sustainable flow of environmental (science-based management), economic (global need), and social (concern for global environment) outputs and benefits.

2. Public and private landowners willingly making investments to create healthy forests.

5. Citizens who understand, accept, and support sustainable forestry and who make informed decisions that contribute to achievement of the vision of *2003 Forestry Program for Oregon*.

Board of Forestry Values addressed by this topic

1. A global context. We believe Oregon's forests are important to the global environment, economy, and society, and that forest managers, government agencies, interest groups, and all other Oregonians should consider the impact of their decisions at local, state, national, and international levels.

3. Active management. We believe Oregon's forests should be actively managed to maintain forest health, to conserve native plant and animal species, and to produce the products and benefits people value. In this context, we define "active management" as the application of practices through planning and design, over time and across the landscape, to achieve site-specific forest resource goals. Active management uses an integrated,

science-based approach that promotes the compatibility of most forest uses and resources over time and across the landscape.

6. Meeting current and future needs. We believe forest resources should be used, developed, and protected at a rate and in a manner that enables people to meet their current environmental, economic, and social needs, and also provides that future generations can meet their own needs.

Thank you for the opportunity to propose this important issue for consideration by the Board. I will be happy to answer any questions that you may have.

Eric Geyer
Forester - Umpqua District
Roseburg Forest Products
P.O. Box 1088
Roseburg, OR 97470
541-679-2524 office
541-643-3202 cell
ericg@rfpco.com

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.

Sandra J Deaton
Printed name
Wife / Property owner
Affiliation
3724 Hogan Rd, Oakland, Or
Mailing address, City, State, Zip
541-459-3629
Phone number and/or e-mail address

Preferred method of contact: mail ___ e-mail ___ phone ___

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

We would like to see the forest protected. The old growth trees are important to retain for future generations to enjoy. Fire fighters should be allowed to use large equipment in all situations & locations when the need is requiring such equipment. Reasonable cleanup and tree removal is a good thing. Raping the land is wrong and causes many problems. Logging with immediate replanting seems reasonable. Problem plants like hawthorne & scotch broom should be sprayed (the ~~land~~ ^{take over})

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.

Craig Chisholm
Printed name

Master Woodland Manager
Affiliation

473 Sixth St., Lake Oswego, OR 97034
Mailing address, City, State, Zip

(503) 635-4719 craigchisholm@comcast.net
Phone number and/or e-mail address

Preferred method of contact: mail e-mail phone

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

The various City Tree Ordinances & Metro's approach to trees have a chilling effect on efforts to get people to plant trees. The reasoning is, if I plant trees I will bring on myself a lot of hassle, so why do it?

This approach of the tree ordinances is counter-productive & is changing the culture away from voluntary tree planting. One has to look long-range to see the problem, but it appears to be there.

at least state should ~~not~~ ~~be~~ broaden the ORS regarding right to cut trees you plant.

Rick Gibson
Oregon Department of Forestry
2600 State Street, Salem, OR 97310 503.945.7440 rgibson@odf.state.or.us

The forestland classification laws, in ORS 526.305 to 526.340, are used to determine which lands in the state shall be subject to the Fire Patrol Assessment and therefore determine which lands the Department protects from wildfire. These statutes have remained substantially unchanged since the mid-1960s and do not accurately reflect how the use of forestlands has changed over time.

Some of the primary concerns with the current classification process include:

- Significant areas of forestland have become a part of the wildland-urban interface, where the primary use of the land is not, as the statutes assume, timber production, grazing or other agricultural uses.
- In wildland-urban interface areas, there is no criteria to determine when an area has become "too urbanized" to continue to be classified as forestland.
- The statutes require that lands be classified according to their "suitability", rather than by their actual use. "Suitability" is a difficult measure to work against, in part because there are no criteria by which to measure it and because suitability is influenced by such things as zoning, conservation easements, current economic policies, encroachment of urbanization and other factors.
- It is unclear where classification boundaries should be drawn. For example, should they be drawn at the tree line, at a set distance back from the tree line, at a land survey line, or at a well defined feature on the landscape?
- What species of trees is "primarily suitable for the production of timber". For example, should juniper be considered "timber"?
- Many counties have failed to appoint a classification committee for a significant number of years and the Department has no procedure in place to make a final classification, in lieu of a committee's actions.
- Recent concern has arisen over the procedure and the cost of filing final classification orders with the county clerk, who is to then maintain it available for public inspection, as required by ORS 526.328(2).

The Protection From Fire Program proposes that a statewide committee, of landowners, Department employees and other stakeholders, be formed to review the current classification process. The committee would recommend to the Board needed statute changes, administrative rule changes and administrative process improvements which are needed to bring the classification process up to date. The committee should be formed in late 2005 and make its report to the Board in 2006, in time to meet the deadline for proposed action by the 2007 Legislature.

Paul Bell
Oregon Department of Forestry
Program Director
2600 State Street
Salem, OR 97310

Phone 503-945-7482

E-mail pbell@odf.state.or.us

Private and Community Forests Program
2006 Board of Forestry Issue Scan
The "Big Look" SB 82

The State budget agreement negotiated between House and Senate leaders includes money to fund a comprehensive review of Oregon's land use program, dubbed the "Big Look." In conjunction with SB 82 the appropriation will commission a new Oregon Task Force on Land Use Planning. The Task Force will make an interim report to the 2007 Legislature and issue a final report to the 2009 Legislature.

Legislation that substantively addressed the legal and policy issues raised by Ballot Measure 37 was not forthcoming from this legislative session. Based upon conversation with Department of Justice attorneys, it is expected that the "Big Look" will likely include consideration of BM37.

The Board of Forestry's *Forestry Program for Oregon* contains actions to support a strong but flexible Land Use Planning Program as a cornerstone of forest resource protection on private lands in Oregon (KEY ACTION) and to stabilize the forestland base and encourage long-term investments in forestland. The Board of Forestry needs to consider the level of participation members of the Board and/or department should have in the comprehensive review and develop the resources and funding for participation. The existing Forest Regulation work plan includes actions related to addressing Ballot Measure 37 and also includes actions related to developing policy about "public expectations for private lands." These existing work plan actions will need to be coordinated with the Big Look.

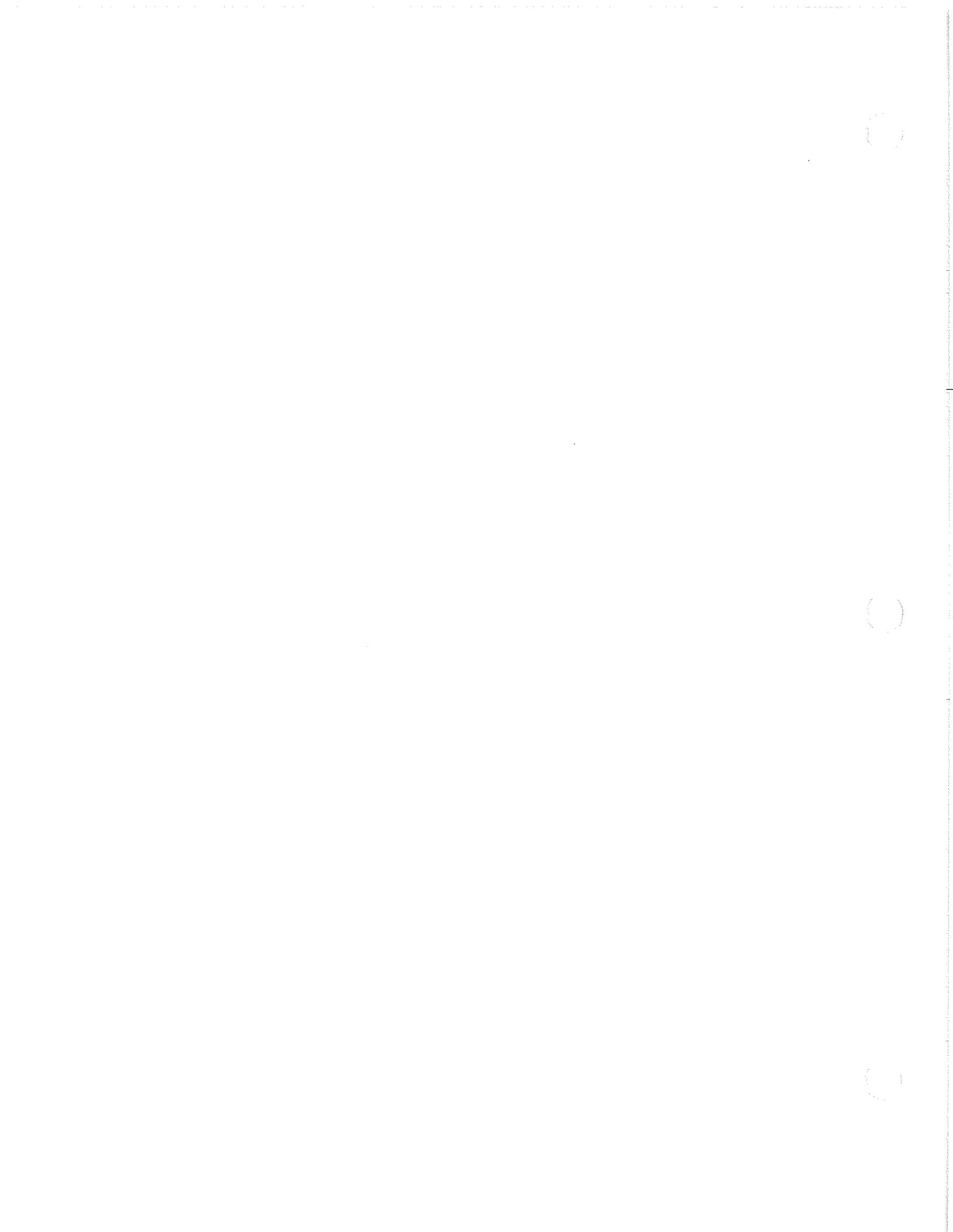
Paul Bell
Oregon Department of Forestry
Program Director
2600 State Street
Salem, OR 97310

Phone 503-945-7482

E-mail pbell@odf.state.or.us

Private and Community Forests Program
2006 Board of Forestry Issue Scan
Sudden Oak Death – Survey, Monitoring and Eradication

The Department has been assisting the Oregon Department of Agriculture with eradication efforts for the pathogen, *Phytophthora ramorum*, which causes sudden oak death. This effort has been confined to a 12 square mile quarantine region east of Brookings in Curry County. The pathogen was first discovered in Oregon in 2001 based on a special aerial detection survey for tan oak mortality symptomatic of the disease. Funding for continued aerial detection surveys, follow-up individual tree surveys, tissue sampling and laboratory analysis for identification has been provided by the U.S. Department of Agriculture (USDA), Forest Service, and Forest Health Monitoring. Since 2001, the Department has received \$276,000 in survey funds, averaging \$40,000 per year. In addition, The USDA Forest Service, Forest Health Protection program has been providing funds for eradicating the pathogen from within the quarantine area. To date, eradication funds have totaled \$800,000 or \$130,000 per year. The USDA Forest Service provides this funding on an emergency need basis. Oregon's efforts have extended beyond the emergency need period and the State needs to provide its own funding for continued survey, monitoring and eradication control efforts on a permanent basis; beginning in October 2007 as this is the date federal funds will no longer be available. If eradication is successful, the need for State funds for eradication will diminish over time, but permanent funding for continued survey and monitoring is needed. In addition, an emergency fund should be created to address the eradication of new introductions. The amounts necessary are \$50,000 for survey and monitoring and \$150,000 per year for eradication for both the 2007-09 and 2009-11 bienniums. Since local coordination of eradication efforts is necessary to ensure landowner acceptance, in addition to the amounts above, funding for a 0.5 FTE at the Natural Resource Specialist 1 level is necessary for the Coos District. This issue needs to be developed as a legislative concept for the 2007-09 biennium with perhaps additional funds secured through the Legislative Emergency Board in the fall of 2006. The Board also needs to encourage the USDA Forest Service and the U.S. Department of Interior, Bureau of Land Management (BLM) to adopt the necessary programmatic environmental analyses necessary to achieve rapid response to sudden oak death occurrence on federal National Forest and Bureau of Land Management lands. Successful establishment of the pathogen would have devastating economic effects to both the Oregon nursery and forest products industry due to limits in shipping products outside the State.



Paul Bell
Oregon Department of Forestry
Program Director
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Private and Community Forests Program
2006 Board of Forestry Issue Scan
Landslides and Public Safety

Senate Bill 12 (1999) required the Board of Forestry to adopt rules in the Forest Practices Act that reduce the risk to public safety from rapidly moving landslides directly related to forest practices. The Board adopted such rules in 2002, which created “high”, “intermediate”, and “low” risk categories. Rules that apply to the intermediate risk category are intended to reduce the risk to public safety by 50% as compared to rule requirements under the “high” risk category. Based on two and a half years of experience administering the rules and considerations about the effects of the rules, an analysis of OAR 629-623-0500 (Timber Harvesting - Intermediate Downslope Public Safety Risk) indicates that beyond the first decade post-harvest, the risk to public safety from shallow, rapidly moving landslides is not reduced 50% by the specified practices and may be increased. The Division 623 rules (Shallow, Rapidly Moving Landslides and Public Safety) could be modified to improve the efficiency and effectiveness of administration.

For high landslide hazard locations with intermediate risk to public safety, OAR 629-623-0500 allows either a clearcut harvest on half the affected area or a thinning harvest on the entire area. Under the clearcut option, the timber on the half that is left may not be harvested for 10 years. When considered as a snapshot in time, this would appear to meet the intent of reducing by 50% the effect of forest practices on shallow, rapidly moving landslides. However, when it is considered over a longer time period, 40 years for example, it can be demonstrated that the risk is not reduced.

It was recognized in Division 623 that the regulation of forest practices for public safety was new territory for the Department and that changes may be needed in the future:

“These rules are based on the best scientific and monitoring information currently available. The department will continue to monitor factors associated with shallow, rapidly moving landslides and also review new research on this issue. The department will recommend new rule changes if this new information suggests different forest practices may be appropriate.” (OAR 629-623-0000(4))

The Department recommends the Board consider possible rule changes, consistent with OAR 629-623-0000(4), that more effectively address public safety risk from shallow, rapidly moving landslides on forestlands.

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Private and Community Forests Program
2006 Board of Forestry Issue Scan
Invasive Species

Invasive species are a pressing environmental and economic threat. In the last century, the introduction of non-native pathogens, plants, and insects has impaired forest health in Oregon. Through recent surveys conducted by the Oregon Department of Forestry and the Oregon Forest Resources Institute forest landowners rate invasive, non-native species as a very high concern. Landowners indicate that a broader coordinated approach is needed to more effectively manage this issue. Individually, landowners are investing time and effort to manage the problem to some extent. As landowner awareness has increased and invasive plant and animal issues have increased landowners are requesting a more coordinated approach to deal with invasive species and additional technical assistance.

Increased commerce, a mild climate, and a continuous influx of people make western Oregon particularly vulnerable to the introduction and establishment of exotic insects, pathogens, and plants. Increasing levels of international and interstate trade in logs and wood products, in particular, make it likely that new pests will be introduced in the future. The introduction of exotic insects and diseases is increasingly becoming a serious threat to the health and vitality of forest ecosystems. Federal policies appear inadequate to stem the current tide of invasive species. Other adjacent states have at times taken less aggressive action to address invasives. The Board of Forestry needs to develop and promote a comprehensive federal/regional strategy to implement a broad coordinated approach to more effectively manage the threat of invasive species. This approach needs to consider changes in federal policies and opportunities to improve state to state consistency.

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Private and Community Forests Program
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Forest Resource Trust

FPFO Strategy "C" (Action C. 1.) indicates that the BOF will..... "promote retention and improvement of the forestland base and long-term forest investments by landowners through Oregon's land-use and tax programs, regulations, forest products market development, and appropriate incentives." The Forest Resource Trust (FRT) [authorized by ORS 526.700] is aligned with "Action C. 1." as one of an array of services provided to forest landowners by the Private and Community Forests Program. However, the FRT is not achieving its objectives. Far fewer acres have been entered into Trust agreements than originally projected.

Key partners and funding sources for the current FRT account are expressing increasing concern about the program's performance and potential, and are asking the department to develop proposals for improving or restructuring the program, or to consider relinquishing the funds currently held in the trust account. These funding partners are also concerned that the Department continue efforts to add acres under contract with the FRT as it is currently structured, while developing proposals for restructuring.

FRT accomplishments have been limited by several factors (to be identified in a FRT issue paper currently in development). If properly restructured, the program may have greater potential to support FPFO strategies, build upon existing partnerships, and strengthen ODF credibility (regarding carbon sequestration projects and landowner assistance). If barriers to success cannot be addressed, a process to terminate the program may need to be considered.

An FRT advisory committee to the Board has been established and needs to be reconvened to assist in evaluating the options. Restructuring or termination will require revision of Administrative Rules governing the Trust

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Issues for Board of Forestry 2006 Issue Scan**

Improved Marketing Systems for Family Forest Landowners

One of the keys to achieving a higher level of economic output of Oregon's forestlands is for family forest landowners to increase their timber harvest. The recent OFRI study on the economics of the forest sector identified a potential for a major increase in timber harvest from family forestlands. This is consistent with past studies of Oregon timber availability. Family forest landowners are very responsive to the timber market. Harvest is higher when markets are good like 2004 and harvest is much lower when markets are bad, like in 2001. The timber market in Oregon has changed and there are generally fewer buyers. In some areas of the state there is only one log buyer. Family forest landowners often manage on longer rotations and use Silviculture systems that produce large diameter logs that currently have limited markets. Many family forestlands are overstocked with small diameter timber and need thinning, but lack markets for small material. Active management of all forestlands to achieve multiple objectives and increased economic production of the forest sector are goals of the Forestry Program for Oregon. Developing improved marketing systems for family forest landowners could help meet both of these goals and address the situations identified above.

The Board of Forestry could address this issue as part of its Forest Vitality Work Plan. Several of the actions identified under Objective 1 of this work plan could be improved by identifying ways to develop improved marketing systems for family forest landowners. An Oregon Department of Forestry staff member assigned to improving marketing systems could help with the work of the Oregon Wood Innovation Center, could help develop small diameter timber and large log markets, could help with biomass projects, could provide technical assistance and support to the Forest Products Marketing Directory, could help with a Brand Oregon project and could help family forest landowners in various regions of the state form marketing cooperatives. At one time, there was an ODF staff member assigned to forest marketing. The FTE was moved to OECD, but the job hasn't gotten done. The Board of Forestry needs to bring this responsibility back to the Department of Forestry.

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Connecting Forest-oriented Economic Development Strategies with the Goal of Supporting Diverse Oregon Forest with a Diverse Forest Economy and Culture:

Oregon is best served by a diverse range of working forests shaped by diverse management approaches. It seems that the trend is toward decreasing diversity and increased simplification with an increase in short rotation, even-age, monoculture plantations and a decline in more ecologically complex, working forests. These trends are both driven by and contributed to by declining diversity in the overall forest products industry and particularly in the processing capacity within the state.

Supporting the vitality of Oregon's family forestlands as an important component of Oregon's forest economy is linked to stopping and reversing the decline in the diversity of Oregon's forest economy. The Board of Forestry and ODF can play an important role by ensuring that their economic development strategies put as more, or more, emphasis on encouraging and supporting diversity as is put on the customary focus of economic development serving the interests of large scale industrial interests.

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Eastern Oregon Forestland Viability

One area of high priority for the Board's attention should certainly be in eastern Oregon. The focus there should be on improving the viability of private forest management. The combination of forest fuels build-up, withdrawal of federal forests from the timber marketplace, and the corresponding loss of manufacturing infrastructure and markets in eastern Oregon has led to economic crises for rural communities and family forestland owners, there.

This growing crisis has been recognized in the Forestry Program for Oregon and also is discussed in the "Background" section of the Board's "Forest Vitality" work plan:

"Oregon, particularly some areas of Eastern Oregon, faces both deteriorating forest health and disinvestment in forestland ownership and manufacturing capacity. Allowed to continue, recovery from these losses will be very difficult. Family forestland owners are particularly affected. As nearby mills close, log transportation costs increase and the value of their timber goes down as a result. Alternative investments become more attractive and the incentive to actively invest and manage their lands as working forests begins to evaporate."

This is well-stated in the first part of the Forest Vitality document, and yet the enormity of the growing forest crises in the eastern part of our state doesn't seem to be reflected in the issues identified and actions proposed in the rest of the work plan. Meanwhile, incentives to "actively invest and manage" eastern Oregon forestlands continue to "evaporate".

The Board has not given eastern Oregon forestlands, both public and private, the attention they deserve. A stronger focus on the eastern Oregon forest crises in the Forest Vitality work plan is needed. Perhaps a Board meeting and tour on eastern Oregon private forestlands would also be helpful to build Board awareness of the issue.

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Smaller Forestland Ownership

The smallest of Oregon's forestland ownerships (1-20 acres, or so) have increased in numbers considerably in recent years, as populations have expanded into rural areas and larger forestland ownerships have been split up. Yet these smallest of forest properties seem to fall through the cracks as far as educational outreach, technical transfer and other assistance is concerned.

The Oregon Department of Forestry's Urban Forestry Program works on the city side of these smaller ownerships. And the regulatory and assistance programs of the Department are primarily focused on medium to larger ownerships on the "really rural" side of the small properties.

The OSU Extension Service has recently begun to develop educational programs for the owners of "backyard forests", but not yet on a state-wide, coordinated way.

The Board of Forestry's new Outreach to Urban Populations work plan is an important new initiative, but it misses these smaller forestland owners by the length (width?) of an urban growth boundary. In fact, there doesn't seem to be a home in any of the current Board work plans for this class of ownership.

It might be useful for the Board to ask the Department to work with the Extension Service to develop a coordinated, state-wide outreach program for the smaller forestland owners.

