

August 31, 2018

To: Oregon Board of Forestry

From: Carolyn Eady, 1990 SE Sheridan St., Astoria, OR 97103

Subject: Written Testimony – Meeting September 5, 2018 - Item 3

The two attachments in your packet reflect the dedication and professionalism of a considerable number of ODF personnel who were involved in studying and evaluating key indicators of the private forestland in Oregon. However, as the appointed leaders of all forestland in Oregon, I would like to raise the question: "How do these studies impact the near-term decisions you are required to make?" Getting a more in-depth scientific understanding of the forests in this region is worthwhile and should continue, but, given accelerating climate disruption (ACD) as documented every day in the nightly news, can this Board afford to wait until the studies provide all the 'answers' before any action is taken?

This Board's responsibilities are captured in Oregon Revised Statutes (ORS's). Two of the most significant responsibilities are cited in part below:

ORS 527.630(3):

.. it is declared to be in the public interest to vest in the State Board of Forestry exclusive authority to develop and enforce statewide and regional rules. You have the authority to act.

ORS 527.630(1):

.. Therefore, it is declared to be the public policy of the State of Oregon to encourage economically efficient forest practices ... and the maintenance of forestland for such purposes as the leading use on privately owned land, consistent with sound management of soil, air, water and wildlife resources ... and to ensure the continuous benefits of these resources for future generations of Oregonians. One segment of the forest industry is violating the intent of this law and jeopardizing the quality of life of current and future Oregonians.

The reality in Clatsop County is far different than the goals just cited. The devastation that has occurred the past three years in the private forestlands along a 6 to 8 miles stretch of the north face of the Coast Range is shocking, especially when you consider the damage done here to the Young's River estuary¹ is occurring all along the Oregon Coast!

Global investment type forestland owners have caused the vast majority of this devastation. To attract investors looking for a 5% return on their investment (ROI) and a hedge against inflation, they use the harshest logging practices to minimize their costs: i.e. heavy equipment, which compacts the soil, and multiple spraying of fertilizers and herbicides by helicopter to speed up growth. This type of logging effectively leaves a 'dead zone' with increased risk of floods. It has also been documented² that helicopter spraying can easily drift to adjacent residential areas and community water sources, causing health problems and requiring local residents to invest large sums of money in an attempt to maintain a potable water supply. Finally, as a result of their short rotation schedule of about 25 years, the northwest section of Oregon has lost approximately one million acres of coverage³, a critical issue in these times of accelerating climate disruption.

The investment type logging firm in Clatsop County is part of a network of limited liability companies (LLC's):

¹ See the **attached map** that shows the extent of the Young's River estuary from the south slope of Astoria to Saddle Mtn.

² See "Behind the Emerald Curtain" a 30-minute film, published by Pacific Rivers, 2017.

³ Coverage is defined as sufficient growth in the canopy as seen from the air to provide coverage or shade on the ground, which in this area is usually 13-15 years

- **L & C Tree Farms LLC** now owns approximately 48% of *all forestland in Clatsop County*. The other 52% is primarily State forestland. (Clatsop County has virtually no federal forestland.) L & C is a subsidiary of
- **GreenWood Resources LLC**, which is a subsidiary of
- **Nuveen Asset Management, LLC**, an affiliated investment advisor & broker for
- **TIAA LLC**, one of the largest owners of timber assets around the globe, worth close to one billion dollars.

The destructive forest practices described earlier are only *half of the story*. John Talberth et al posted a study in 2016 that stated, Oregon forests were a very large contributor of greenhouse gases (GHG). Their estimates have recently been supported by another independent study at Ohio State that used a different method to arrive at the same conclusion.⁴ Now, it is estimated that forest practices in Oregon top transportation as the number one emitter of GHG.

Discussion: Over the past 3 years, one large investment logging company has been able to consolidate all the large industrial forestland in Clatsop County. Unless they are prevented from doing so, any remaining acres not yet logged will be logged in the same destructive way.

At the same time, by any measure, Oregon is not meeting its obligations to combat climate change. The Oregon Global Warming Commission has stated Oregon will not achieve either the 2020 or 2030 state goals. Around the globe, various countries are racing to restore forests and plant millions of trees; they recognize that trees are one of the best ways to remove carbon dioxide and other pollutants from the atmosphere. It is ironic that Oregon, as one the best places in the world for growing large trees, is in the midst of a wholesale removal of trees up and down the length of the state, while ODF's best FPA enforcement tool is the incentive of investment owners for no violations on their record, so as to maintain their 'SFI seal of approval' and thus be able to sell their timber products to Home Depot and other outlets.

Recommendations:

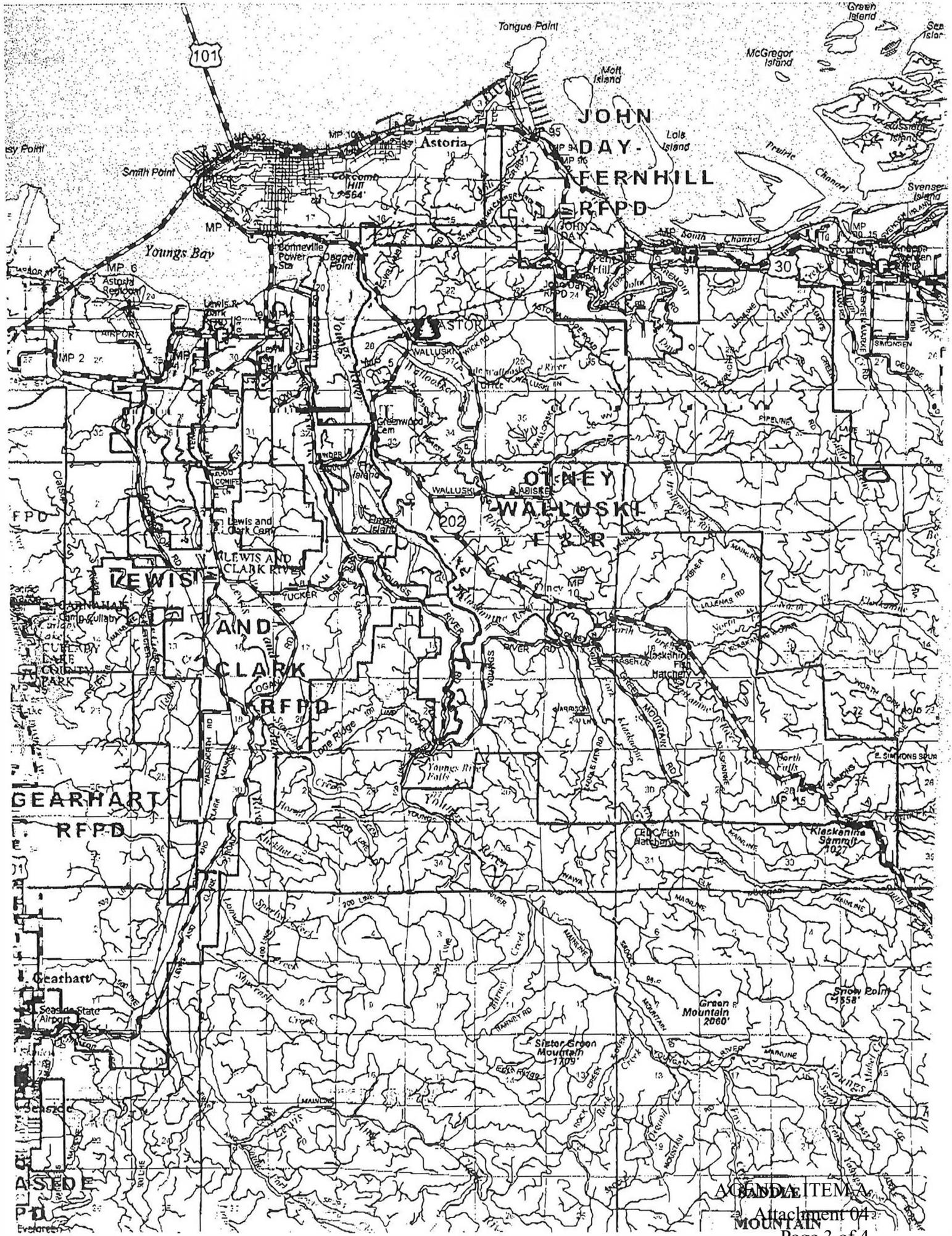
1. Consider the most straight forward and narrowly defined way of quickly stopping the destructive practices of investment type owners by adding a requirement in the FPA rules that all large private forestland owners must be able to show through an audit of their logging records that their replanted trees have grown sufficiently to provide 'coverage.' Large, responsible logging firms will have no problem meeting this requirement, but it will effectively shut down the investment owners. Legal opinions need to be obtained about their liability for restoring this land or, if they 'walk away' from their holdings, does this land revert to the County or ODF?
2. If a majority of the Board decides to move forward on this or a similar proposal, devote the November workshop to this topic, inviting various experts, government officials, and other affected state agencies, such as DEQ and the Department of Agriculture.
3. Meet in either Astoria or Tillamook. Your tour day will allow you to actually see the results of these destructive logging practices, a scene that is very difficult to accurately describe.⁵

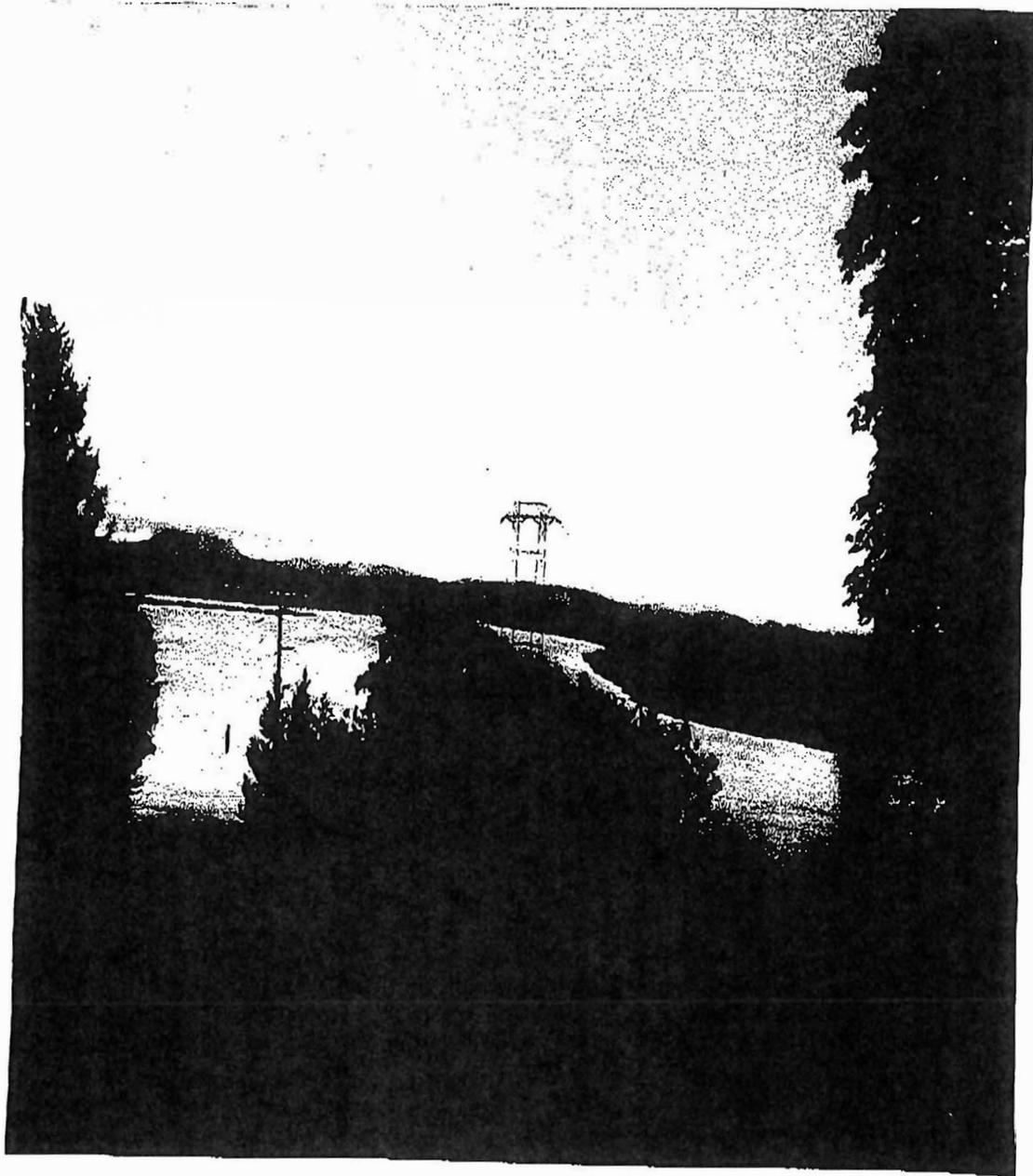
Conclusion:

These recommendations are very narrowly targeted. Many other efforts are underway to address other issues related to forestry in Oregon and should continue. However, your decisive action on this issue would still be a very significant step. Oregon must act quickly if we are to meet our goals and hope to do our part to impact the dire climate disruption projections by scientist around the world. With the Board's leadership and the essential support of the Governor and Legislature, Oregon has the opportunity to re-imagine its future: to begin to restore the damaged forestlands, to stimulate the state's economy and to make a significant contribution to controlling climate change.

⁴ Law et al, Proceeding of the National Academy of Science, Nov. 16, 2017.

⁵ See the **attached photo** of the north face of the Coast Range as seen from the south slope of Astoria.





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September 12, 2018

TIAA, Corporate Secretary's Office
730 Third Avenue
New York, NY 10017-3206

Dear Sir:

As a long-time member of the TIAA/CREF retirement plan through the University of Michigan, and, now as a beneficiary since my retirement, I am writing to convey my utter dismay over what your Corporate Governance and Social Responsibility policies have done to the private forestlands in Oregon.

From the north, where I live, to the southern reaches of the State, a strip of land between the Ocean and the Coast Range has been absolutely devastated. The forests that used to be harvested on a 40+ year rotation, have been transformed into, as you so aptly describe in your literature "an agriculture operation" that is harvested every 25 years. In your zeal to get a 5% return for your investors, you use the lowest cost methods such a heavy equipment and multiple aerial sprayings of toxic chemical that are causing structural and sexual anomalies in frogs, and now in children who live nearby.

These and other negative impacts, most importantly, on the State's ability to rein in greenhouse gases, are describe in detail in the attached testimony I gave to the Oregon Board of Forestry last week. I also proposed a relatively quick way of shutting down these operations.

I would like this letter and its attachment to be shared with the Chairman of the TIAA Board and the current members of the Board who serve on the Corporate Governance and Social Responsibility Committee.

I sincerely hope that this information will be reviewed with the seriousness it deserves.

Carolyn Eady

CC: Oregon Board of Forestry
Oregon Governor, Kate Brown

Attachment