



Siskiyou Streamside Protections Decision

Comment by Rex Storm, Associated Oregon Loggers, Inc.
before the Oregon Board of Forestry – June 5, 2019

Chair Imeson and Board members, my name is Rex Storm, Certified Forester, Certified Tree Farmer, and Forest Policy Manager for Associated Oregon Loggers (AOL). I make these comments on behalf of 1,000+ AOL member companies, representing logging allied and forest management business.

We urge the Board to *approve* the Department's recommendation concerning the Siskiyou Geo-region's small and medium fish streams.

- a) There is inadequate evidence to determine that current riparian rule harvest prescriptions are performing anything other than for achieving good water quality, and desired future condition; and
- b) The Department's next step should be formulation of study approaches to test rule sufficiency for desired future conditions— approaches for later consideration by the Board.

Our support of the Department's recommendation is consistent with other forest concerns—including the Board's Regional Forest Practices and Committee for Family Forestland advisory committees.

Operator Stewardship Means More than Regulation

Streamside forestry is a chance for me to share about the stewardship, pride, and culture of high standards for renewable forestry—among those Oregon businesses with whom I work.

All of these forest businesses help manage those forest streamsidess about which you decide today. And, many of these forest businesses also own forestland property and forest streams. I know of no more diligent stewards of forestland than these family-operated forest contractors. We share with the Board this mutual concern for streamside stewardship. Your consideration of Oregon Forest Practices riparian rules is of critical concern to our success together!

The forest professionals I represent—they grow, harvest, reforest, construct, transport, enhance, and protect Oregon's private and public forestlands. "Stewardship" is their proud culture and their lifeblood, because they daily experience the renewal of active forestry; and their family businesses are often multi-generational outfits who thrive from their renewal forestry labors.

As testament of this long-term renewable stewardship commitment, two of our member companies this year are honored for their 75 years of family forestland stewardship. That's 75 years of *American Tree Farm* certification by Giustina Land & Timber Co. and Giustina Resources LLC. It's from stewards such as these dedicated families—and their professional staff—for whom I can confidently speak today to you about riparian forestry protection.

My written testimony includes an explanation of the important cooperation that strengthens the FPA Rules. "Cooperative stewardship" is key to make the FPA Rules more effective in practice— more effective than would be by regulation alone. Willing compliance by operators happens because of continued working relationships and acceptance of rule validity. The three primary forest operating partners each have vested commitment to the Rules: operators; landowners; and ODF foresters.

Cooperative Education for Operators Enhances Compliance

A jointly-sponsored program by:

Associated OR Loggers, Inc. and OR Dept. of Forestry – Private Forests Program

Since 2000, Associated Oregon Loggers, Inc. (AOL) and Oregon Dept. of Forestry (ODF) have cooperated under a formal Agreement to provide effective operator education that aims to increase understanding and ensure high compliance with forestry regulations. This cooperation is formalized via a 'Memorandum of Agreement for Operator Education' (MOA) between AOL and the ODF Private Forest Program. Each year, AOL and ODF provide continuing education for operators, reaching more than 2,000 individuals annually.

AOL and ODF mutually strive to keep operator education programs effective at informing operators about current forestry regulations, guidance and compliance issues, areas for improvement, as well as encouraging communication between contractors and local ODF foresters/fire officers. ODF foresters confirm that they observe better forest rule compliance by those professional operators who better understand the rules involved in their day-to-day forest management work.

This 19-year-long cooperative education program affords many benefits toward strengthening forest rule compliance and nurturing important relationships among the forest workers engaged in forest operations. Good rule compliance results largely due to the willing voluntary performance of informed landowners and operators to conduct sound forestry. Operations commonly occur with minimal or no oversight by approx. 55 ODF stewardship foresters, working statewide. Yet, the ODF stewardship foresters indeed offer important value-added to operations through their accepted assistance roles in education, engineering/design, and enforcement. The operator education MOA serves to support these roles.

Strengthening rule awareness and compliance yields positive outcomes that are shared amongst our three primary forest operating partners: 1. Operators; 2. Landowners; and 3. ODF Foresters. We often refer to this triad of operations partners who willingly do good forestry, as "Cooperative Stewardship."



There are a dozen benefits observed over the 19-year history of this operator cooperative education program. Future success of this MOA partnership between AOL and ODF relies upon our mutual effort to continue delivering operator education that strengthens forest rule compliance and fosters good relationships—leveraging the following benefits:

12 Partnership Benefits How Benefit Adds Value to Rule Compliance

OPL-required continuing education for operators	Operator OPL-FP training; SFT-Employee training; Self-Tests
Forest rule compliance	Improved operator compliance with FPA, fire and burning
Compliance Report (Audit): Operator Improvement Lessons	Inform operators about where to improve: lessons found in FP rule compliance study – operators asked to work-on low compliance items
New Rules	Established venue to institute & inform about rule change (e.g. SSBT)
Customary Delivery Mechanism	Forest practices training is customary part of every OPL operator company's routine annual business

Communication Among Parties	Demonstrate to operators the importance of communicating often with landowner, steward forester, purchaser, subcontractors, employees
Stewardship Forester Role – 3 E	Increased operator appreciation of Stew Forester's value toward assisting operator succeed (through <u>E</u> ducation/ <u>E</u> ngineer/ <u>E</u> nforce)
ODF Forester outreach	Enhanced Stewardship Forester relationships with operator community
Planning First	Encourage advance planning on every job to accommodate unique challenges, designs, schedules, compliance, and costs
Continuous Improvement	Recurring forest practices training is a vehicle reinforce ongoing improvement in compliance: e.g. reminders, new ideas, sharing
Alerts/ Warnings!	Avenue to reach operators about vital new-found compliance issues or problems to avoid; key corrections needed
Recognition & Climate-building	Occasion to recognize and promote good operations and awards; share superior performance with policymakers & opinion-leaders

Cooperative Stewardship Makes Strong Streamside Protection

I share this cooperative stewardship relationship with you so that you may more fully appreciate the seminal role forest cooperators have in achieving desired results in Oregon’s forests—across more than 15,000 FPA activity notifications annually addressed by ODF stewardship foresters statewide.

I make this Siskiyou streamside recommendation in respect for the Board’s 48-year commitment to Oregon’s Forest Practices Act and Rules (FPA), which has evolved in the spirit of cooperative stewardship with the Board’s advisory committees and forest cooperators. Your cooperators include the forest landowners, operators, and other dedicated forest professionals who uniquely share in Oregon’s private forest resource protection—a commitment unsurpassed in other states or in other land uses.

These cooperators teamed with the Board and Oregon Legislature to author the Act in 1971, and together we share counsel to continue strengthening our stewardship with the FPA Rules. This cooperative steward relationship has forged America’s most respected forest regulation through our unique partnership between the state and private sector. We’ve accomplished so much together in 48-years.

Please approve the Department’s recommendation and honor the agency’s 48-year commitment to cooperative relationships with forest landowners and operators. This Department streamside recommendation has been developed with deliberate and thoughtful agency consideration. Contemporary science and cooperative stewardship has not evidenced that desired streamside conditions are somehow unsatisfactory under current protections.

Thank you for assuring effective FPA rulemaking can be willingly employed through stewardship by Oregon’s forest cooperators.