

Chair Golden and Members of the Senate Committee on Natural Resources and Wildfire Recovery:

I'm writing to you today to encourage you to vote NO on SB 335 which would eliminate the input of the men and women working on the ground in Oregon's forests.

1. This is regulation without sufficient representation.

- a. The Board's seven members make pivotal decision on management activities that are critical to the success of our rural businesses and the communities they support throughout Oregon.
- b. It is impossible for the Board to adequately review and vote on regulations without the benefit of on-the-ground, practical knowledge of how those regulations will impact the many foresters, loggers and landowners who work in the woods every day.
- c. This is akin to a hospital board not having the input of physicians, or a dental board not having the input of dentists.
- d. The \$1,000 annual income limit, either directly or indirectly from the forest products sector, for other Board members is incredibly low and may inadvertently catch members with, for example, a retirement account that invests in part of the funds with timber management real estate trusts. If included, it should also apply equally to those from environmental interests.

3. This is a solution in search of a problem.

- a. The Board is not unduly influenced by the industry. In fact, the Board regularly ignores the concerns of professional foresters.
- b. Recent examples like the unanimous approval to move the proposed State Land Habitat Conservation Plan forward demonstrate the Board continues to ratchet up regulation of the industry, often ignoring professional foresters' strong opposition. Other examples include approval of expanded riparian buffers for Salmon Steelhead and Bull trout to meet an arbitrary

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cold-water standard in 2017, and direction to develop a plan to identify and protect Marbled murrelets to prioritize more stringent protections for a species whose populations are trending positive in Oregon.

4. This further politicizes a highly controversial and contentious Board.

- a. For the past five years or more, appointments to the Board have been highly controversial, often failing to receive Senate approval.
- b. Requiring the Governor appoint the State Forester and that he/she report to the Governor only stands to further politicize the position and the agency and is not a way of achieving long-term stability in agency administration.
- c. The current system allows executive oversight without completely politicizing the position and the agency as a whole. Several, if not most agencies, boards and commissions in Oregon function in this manner.

5. Having regular open dialogue with the regulated community is a part of good governance.

- a. The Regional Forest Practices Committees give the agency and Board the opportunity to receive insight from on-the-ground practicing foresters, forest engineers, landowners, and watershed managers, helping inform policymakers when new rules, guidance documents, or other forest policies are being developed.
- b. These regional advisory committees focus on the unique differences and characteristics of that forest region, for example the Siskiyou are very different than coastal forests.
- c. These are merely advisory committees – nothing in statute binds or directs Board policy through these committees.

6. The composition of the Board of Forestry should not be under consideration right now.

- a. This topic was one of the elements of both timber and environmental initiative petitions that were clearly set aside when the Private Forest Accord was struck in February 2020.
- b. The Legislature supported that agreement by passing Senate Bill 1602 in June of 2020, and it should continue that support by not pursuing this issue while the Private Forest Accord negotiations are ongoing.
- c. The objective of the Private Forest Accord is to produce proactive legislation for the 2022 session.

Thank you for the opportunity to provide these concerns.