



February 9, 2022

Chair Jeff Golden
Senate Committee on Natural Resources and Wildfire Recovery
Oregon State Legislature
900 Court Street NE
Salem, OR 97301

Submitted via OLIS

Re: Sierra Pacific Industries – Seneca Opposition of SB 1534

Chair Golden and members of the Committee,

My name is Todd Payne, and I am the President and General Manager for Sierra Pacific Industries' (SPI) Lumber Business and the Oregon Forest and Industries Council Board Chair. Until SPI's acquisition of Seneca in Fall 2021, I held the position of CEO and President of Seneca. Sierra Pacific Industries is a third generation, family-owned forest products company. We are a leader in the manufacturing and the owner of over 2.3 million acres of sustainably managed working forestland across the West Coast. With the 2021 purchase of Oregon-based Seneca companies, we are proud to now operate in rural and urban Oregon communities.

Our experienced foresters and professional staff take their roles as technical experts in the management of our timberlands seriously, rooting our decisions, practices, and investments in proven science and research. Because of this, sustainability is seen in all facets of how SPI operates, in how we harvest and grow trees, manufacture product, and support the families and communities we operate in and around.

While SPI supports the general notion of recognizing our private, sustainably managed, working lands as part of the state's climate solution, we are unable at this time to support SB 1534 as it does not link the objectives and opportunities laid out in the preamble with terminology and scientific approaches that will result in outcomes which leverage the full potential of Oregon forests. Oregon forests are managed by a diverse group of owners, and each ownership can contribute climate benefits, but the bill fails to empower those owners and their potential climate contributions with inclusionary terminology and directives. This bill as written is exclusionary because its terminology limits the potential ways forest landowners can contribute carbon sequestration and storage. The bill needs additional detail and clarity so that it results in a program that really does "(c) Ensure that a diversity of landowners and managers are able to participate in incentive-based programs for carbon sequestration..."

While SB 1534 is intended to set state policy to increase carbon sequestration in natural and working lands and waters, the bill currently lacks specificity, critical science, and technical fundamentals necessary to result in actionable policy that elicit the full potential of Oregon forest owners to contribute climate benefits. In addition, the bill adds layers of ongoing monitoring by a multitude of

undefined agencies. The bills approach to monitoring and reporting should be refined. The definitions and policies noted in the bill are overbroad, unclear, and at times contradictory to themselves. We also note the intent for inclusivity noted in the text of the bill is not reflected in the advisory committee framework which lacks a guarantee of adequate representation of the landowner community. We are concerned that this lack of clarity and inclusion will lead to future conflicts, confusion, and an inability to implement meaningful policies.

For these reasons, SPI is in strong opposition to SB 1534.

Sincerely,



Todd Payne
President and General Manager
Sierra Pacific Industries, Lumber Business