



**Oregon Small Woodlands Association
Opposition to SB 530 as drafted.**

We believe private forestland owners can add important contributions to climate change mitigation, thus, we support voluntary programs that incentivize small family forestland owners to implement climate-friendly forest management actions on their properties across Oregon. These incentive programs need to be simple and affordable for small family forestland owners. However, if SB 530 is to move forward, there are changes that will need to be made for it to earn the support from OSWA and we believe for it to be successful to achieve the intended goals.

SB 530 must recognize that Oregon's forests and the wood products industry they support already make a significant contribution in sequestering carbon in the wood products produced and by continually storing carbon in the wood fiber grown every year. Through the growing and harvesting of trees, there is a constant flow of new carbon storing units (wood products) produced and used as well as a constant renewal of carbon in the forest. Oregon's land use laws and Forest Practices Act already set up a scenario where Oregon's forests and its wood products industry will continue to be major factors in carbon sequestration. We believe the bill will need to address not only the carbon stored in the forests but also the carbon stored in the use of wood products as building materials and other wood products. **To achieve this, SB 530 needs to be changed to add into the definition of stored carbon the amount of carbon in wood products.**

Access to markets for wood products is of great concern for small forestland owners. Landowners in Eastern Oregon have already experienced a nearly complete collapse of the forest product industry due to declining supply of raw materials off federal forests. Any bill which would make that issue worse, OSWA cannot support. SB 530, in Section 2, does direct state agencies to increase the long-term fiber supply. **The bill as drafted does not mention short or mid-term fiber supply, both which must be maintained before long-term supply can be increased. OSWA requests this oversight be corrected before the bill moves forward.**

SB 530 should have oversight by parties who answer to the public either as an elected official or authorized by elected officials. The Global Warming Commission is given a lot of authority in SB 530, yet this Commission by its design does not meet these important criteria. It is not balanced and does not have the structure and expertise to qualify it for such oversight authority. Additionally, the advisory committee set out in Section 10 of

the bill is also not balanced in representation. **To meet the requirements of OSWA, the committee needs at least equal representation by landowners who would be affected by the decisions of the committee, including both large and small forestland owners and forest product manufacturers.**

The bill also gives the Department of Energy, along with the Global Warming Commission, the authority to set goals and determine how natural and working lands will be regulated and managed. **OSWA cannot support a bill which could allow these entities to regulate how forestland is managed. The Department of Forestry currently is responsible for overseeing the management of Oregon's private forests. That responsibility cannot be transferred to another agency.**

In closing, OSWA believes forests play an important role in carbon sequestration and storage (CSS), and SB 530 efforts to incentivize efforts to increase CSS is positive for family forest landowners and all Oregonians. A successful strategy should develop voluntary programs that encourage forest owners to do things that sequester carbon such as afforestation, avoiding forest conversion to other uses, emphasize urban forestry, and carbon focused forest management. Because of the size of small forestland owner's properties, incentives probably provide a greater opportunity than offsets, however offsets should be designed to allow small forest owners an opportunity to participate.

The Oregon Department of Forestry (ODF) already has experience in programs that incentivize forest owners. SB 530 should direct the Oregon Department of Forestry to identify and evaluate ways to improve coordination of federal, state, and local programs designed to incentivize private forest landowners across the state to enhance implementation of forest management actions that benefit carbon storage and sequestration. SB 530 should also designate the Oregon Department of Forestry as the state agency responsible for developing rules and protocols to implement a forest carbon offset program for forestlands. ODF should be directed to contract with qualified third-parties to develop forest offset protocols.

These programs should rely on existing Oregon forest practice rules, with additional environmental safeguards, such as independent third-party certification, required to be customized for each of Oregon's major forest types and relevant to land ownership type, as well as scale, scope, and intensity of management activities.

Thank you for the opportunity to testify.

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