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February 12, 2025

The Honorable Ben Bowman, Chair
House Committee On Rules
Oregon State Capitol
Salem, OR 97301

Subject: HB 2692 - **SUPPORT**

Chair Bowman, Vice Chairs Drazan and Pham, and Members of the Committee:

For the record, my name is Amanda Sullivan-Astor, Forest Policy Manager at Associated Oregon Loggers and a certified forester. On behalf of AOL, I am writing to express strong support for HB 2692. We are the trusted voice for Oregon's small, family-owned logging businesses—companies that are directly regulated, financially impacted, and operationally affected by the very rules this legislation seeks to improve.

Associated Oregon Loggers has participated in countless rulemaking advisory committees. We show up—often in the minority, sometimes in the super minority—bringing real-world expertise to the table. Yet, time and again, the practical insights from those who *actually* implement these rules often have their insights overlooked, while statewide NGOs—without direct responsibilities like payroll or worker safety—shape Oregon's policies. Many don't fund the agencies they influence as they are not assessed producer taxes or other fees that feed state budgets. They often impose decisions rather than collaborate, sometimes creating challenges for small businesses in pursuit of their own agendas.

Why HB 2692 Matters

HB 2692 brings much-needed balance and fairness to the process. It ensures that agencies include representatives from regulated entities on advisory committees, allowing those of us who understand the real-world impact of rules on costs, operations, and people's lives to have a voice in the discussion. The bill's fiscal impact provisions encourage agencies to consider the economic consequences of decisions, incorporating valuable input from the businesses that will be directly affected.

For small forest operators, HB 2692 means:

- **An Opportunity for Fair Participation in Rulemaking:** This allows perspectives of those directly involved to be heard and valued.
- **Accountability:** Agencies will be required to support fiscal impacts with real data.
- **Efficiency:** Rules that are informed by practitioners are more likely to be workable, reducing compliance confusion, administrative burdens, and costly missteps.

The Reality We Face Without This Bill

Without HB 2692, rulemaking continues to be a process where ideology often outweighs expertise. Agencies may fulfill the "public involvement" requirement, but it is without truly engaging those directly impacted. Oregon's small businesses, which are vital to rural economies, are frequently overlooked in decisions that have a significant impact on their ability to thrive or struggle.

I urge you to support HB 2692 and stand with the Oregonians who do the hard work of managing our forests, employing our neighbors, and sustaining our rural communities.

Thank you for your consideration!

Amanda Sullivan-Astor, CF

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A Trusted Partner for Oregon's Forest Operators