



Dear Co-Chairs Helm and Owens, and Members of the House Committee on Agriculture, Land Use, Natural Resources, and Water,

My name is Krystal Abrams, and I am the Programs Director for Beyond Toxics. I am writing to express our organization's opposition to HB 4105.

Beyond Toxics is an Oregon-based environmental justice organization working to protect public health, climate stability, and ecosystems from harmful policies and practices. We stand in solidarity with our partner organizations who oppose this bill and share deep concerns about its implications for Oregon's forests, communities, and climate future.

### **HB 4105 shifts forest management away from balance and adaptability**

While HB 4105 is framed as a measure to ensure reliable forest management outcomes, the bill fundamentally reshapes forest governance by elevating timber production as the primary enforceable outcome while deprioritizing climate resilience, carbon storage, habitat protection, and public values.

The bill requires the State Forester to establish 10-year timber harvest levels, expressed in annual increments, and to manage state forestlands "to produce" those levels. It further creates new legal pathways for counties and other revenue beneficiaries to seek court orders compelling timber production if harvest targets are not met.

Notably, there is no parallel enforcement mechanism for climate goals, carbon storage, water quality, wildlife habitat, or public safety, values that Oregonians consistently identify as priorities for our public forests.

### **This bill increases pressure to log, even as climate risks intensify**

HB 4105 defines "sustainable" solely in terms of timber volume over time, rather than ecological sustainability, climate resilience, or long-term forest health. The requirement to roll forward unharvested timber into future harvest expectations creates structural pressure to log more aggressively, particularly when harvests are deferred for ecological, climate, or public safety reasons.

At a time when Oregon's forests are experiencing increasing wildfire severity, increased and prolonged drought and heat stress, insect and disease outbreaks,

rapidly changing ecological conditions, it's vital to consider how forest policies can be shaped to help Oregon build ecological resilience. HB 4105 currently constrains the State Forester's ability to adaptively manage forests in response to climate realities. Rigid, enforceable timber harvest targets are extremely high risk in an era of accelerating climate disruption.

### **Climate and carbon storage are treated as optional, not a priority**

HB 4105 does not require compliance with Oregon's Climate Change and Carbon Plan, nor does it require the State Forester to manage forests for carbon sequestration. Climate considerations are not currently listed as a required management goal, despite forests being one of Oregon's most effective natural resources to help defend against climate dangers.

By making timber harvest levels the only enforceable management outcome, the bill weakens Oregon's ability to meet its climate commitments and undervalues the role of standing forests in storing carbon, mitigating the impacts of extreme heat, and protecting downstream communities.

### **The bill invites litigation without improving outcomes**

HB 4105 creates new avenues to sue the State Forester, in that any person may seek a court order if harvest levels are not established and revenue beneficiaries may sue if harvest levels are not produced.

This one-sided enforcement framework has the potential to increase litigation, divert agency resources, and encourage defensive decision-making without demonstrably improving forest health, climate resilience, or community well-being.

Importantly, the State Forester already establishes sustainable harvest levels consistent with the statutory obligation to manage state forests for the Greatest Permanent Value of all Oregonians, and the Department of Forestry is already evaluating future harvest levels with county input.

### **We urge the Legislature to ask: why this policy and why now?**

As Oregon continues to face rapidly fluctuating and unexpected climate challenges, we believe the Legislature should be advancing policies that:

- Strengthen climate-smart forestry
- Increase carbon storage and ecosystem resilience

- Reduce wildfire risk to communities
- Protect clean air, clean water, and biodiversity
- Support rural economies without locking the state into rigid, extractive models

**HB 4105, as currently proposed, does not move Oregon in that direction.**

Instead of constraining adaptive management and elevating timber production above all else, we urge the Legislature to invest in policies that align forest management with Oregon's climate goals and the long-term health of our people and environment.

For these reasons, Beyond Toxics respectfully urges you to oppose HB 4105.

Thank you for your consideration and for your commitment to prioritizing Oregon's natural resources and environmental integrity.

Respectfully submitted,

Krystal Abrams

Beyond Toxics