



Issue Scan 2009

Preliminary Analysis Matrix

(Sorted by Submitter Last Name)

Tuesday, August 18, 2009

Adams, Paul		Category: 3. General Comments Not Related to Specific Work Plan
Issue: 212	Title: Identify Priorities, Efficiencies	Subject: Board of Forestry
Description	<p>The State of Oregon is facing some unusually severe economic challenges, which are expected to directly impact the Oregon Department of Forestry (ODF) and its ability to support the policies and programs that are a primary focus of Board activities and interests. As such, it seems clear that the Board must pointedly identify and address both top priorities and major efficiencies for its own work and that of ODF. And given the level of unfinished tasks and existing workloads, new issues and initiatives should be considered only with great care and caution. The Issue Scan process itself should be used to help identify key priorities and efficiencies, rather than further diluting the available resources.</p>	
Staff Comments by: Agency Affairs	<p>This comment echoes a theme from the 2007 issue scan regarding current Board and agency workloads, and the need to set priorities. Current economic difficulties may be seen as adding new urgency to the need to carefully allocate resources among existing and new projects. Given the recurrence of this theme in consecutive issue scans and the current budget climate, it appears to be an important topic for the work group and for the Board.</p>	

Adams, Paul		Category: 3. General Comments Not Related to Specific Work Plan
Issue: 213	Title: Information Gathering and Decision-making	Subject: Board of Forestry
Description	<p>Recently, the Board discussed and used a voting process for some major policy decisions. This is a constructive step because policy making can involve difficult decisions where sole use of a consensus process can expend large amounts of critical time and energy. Such changes in the Board's information gathering and decision-making processes should be seriously considered and implemented where they can significantly streamline policy-related input and decisions. If needs for stakeholder or ODF staff input are expected, this input should be sought early and the solicitations for input should pointedly request specific policy ideas or recommendations. Similarly, OSAF strongly encourages you to engage those stakeholders and potential partners that are especially well-equipped and committed to problem-solving policies and practices on Oregon's forest lands. This includes the professional forestry community, independent of employer/client interests, a group that is well represented in the 1,000-member OSAF. A similar appeal was made by OSAF in response to the 2007 Issue Scan, but OSAF has yet to be specifically invited to assist the Board on any of its or ODF's advisory committees or with any other initiatives of interest to the Board.</p>	
Staff Comments by: Agency Affairs	<p>This comment addresses the Board's decision-making processes, in particular the use of voting, and the need to consult with those stakeholders best able to provide useful input. The commenter suggests that the Board draw on the expertise available through the Oregon Chapter of the Society of American Foresters. The issue scan work group may wish to recommend that the Board evaluate the information-gathering sections of its work plans to ensure use of a broad spectrum of expert input.</p>	



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Arkin, Lisa		Category: 2. Addressed in Current Work Plan
Issue: 181	Title: Pesticides - Various Issues - Arkin	Subject: Forest Practices - Pesticides
Description	<p>Protecting Oregonians and our native fish from pesticide exposure should be a top priority for ODF. Governor Kulongoski has made toxics use reduction one of his four top priorities and has directed all state agencies to take actions that reduce the use of toxic chemicals.</p> <p>We urge the BOF to reallocate resources for the following purposes:</p> <ol style="list-style-type: none"> 1. Do a thorough scientific literature review of herbicide impacts on wildlife, particularly aquatic species. 2. Do water quality sampling in primary small streams - tributaries following aerial herbicide applications, particularly after rain events. 3. Ban the use of herbicides that are a known or suspected carcinogen, neurotoxin, mutagen or endocrine disruptor. 4. Create and implement a plan to comply with the Governor's directive to reduce toxics and set goals and benchmarks that measure how ODF is improving forest health and water quality by reducing the types and amounts of highly toxic pesticides. 	
Staff Comments by:	See staff response, General Concern about Pesticides, issue ID # 11	
Private Forests	See staff response, Pesticide Literature Review and Use of Best Available Science, issue ID # 22	
	See staff response, Pesticide Monitoring, issue ID # 23	
	See staff response, Public Health, issue ID # 20	

Baynton, Katherine		Category: 2. Addressed in Current Work Plan
Issue: 143	Title: Pesticide Use - Baynton	Subject: Forest Practices - Pesticides
Description	PLEASE we need a buffer zone to stop spraying pesticide near our homes.	
Staff Comments by:	See staff response, Buffers for Pesticide Application, issue ID # 20	
Private Forests		



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Baynton, Katherine		Category: 4a. Outside Board Purview
Issue: 144	Title: BOF Conflict of Interest - Baynton	Subject: Board of Forestry
<i>Description</i>	BOF members should not have financial conflict of interest.	
<i>Staff Comments</i> by:	Please refer to issue 16	
Agency Affairs		

Baynton, Katherine		Category: 3. General Comments Not Related to Specific Work Plan
Issue: 145	Title: Clearcutting - Baynton	Subject: Forest Practices - Clearcutting
<i>Description</i>	Stop clear cutting our forests	
<i>Staff Comments</i> by:	See staff response, stop clearcutting, Issue #67	
Private Forests		

Baynton, Katherine		Category: 1b. New Topic: Incorporate Input Into Existing Work Plan
Issue: 146	Title: Diverse Forests - Baynton	Subject: Forest Practices - General
<i>Description</i>	Please plant diverse trees.	
<i>Staff Comments</i> by:	See staff response, Diverse forests, native plants; no monocultures, Issue ID # 59	
Private Forests		

Baynton, Shawna		Category: 2. Addressed in Current Work Plan
Issue: 153	Title: Pesticide Use - Baynton, S	Subject: Forest Practices - Pesticides
<i>Description</i>	Please stop spraying pesticides near our homes. We need a buffer zone to STOP spraying pesticides near homes.	
<i>Staff Comments</i> by:	See staff response, Buffers for Pesticide Application, issue ID # 20	
Private Forests		



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Baynton, Shawna		Category: 4a. Outside Board Purview
Issue: 154	Title: BOF Conflict of Interest - Baynton, S	Subject: Board of Forestry
<i>Description</i>	Board of Forestry members should NOT have financial conflict of interest.	
<i>Staff Comments by:</i> Agency Affairs	Please refer to issue 16	

Baynton, Shawna		Category: 3. General Comments Not Related to Specific Work Plan
Issue: 155	Title: Clearcutting - Baynton, S	Subject: Forest Practices - Clearcutting
<i>Description</i>	Please STOP clearcutting the forest!	
<i>Staff Comments by:</i> Private Forests	See staff response, stop clearcutting, Issue #67	

Baynton, Shawna		Category: 1b. New Topic: Incorporate Input Into Existing Work Plan
Issue: 156	Title: Diverse Forests - Baynton, S	Subject: Forest Practices - General
<i>Description</i>	Please plant diverse trees instead of commercial trees.	
<i>Staff Comments by:</i> Private Forests	See staff response, Diverse forests, native plants; no monocultures, Issue ID # 59	

Beck, Sharon		Category: 2. Addressed in Current Work Plan
Issue: 5	Title: ODF Role in Federal Forest Management Policy	Subject: Federal Lands
<i>Description</i>	<p>We believe that Oregon Department of Forestry (ODF) should take a larger roll in Federal forest management policy to bring it in line with good forest management practices that apply to state and private lands. Management would be more efficient, effective and products from the forests more sustainable if we viewed the Federal Government as just another land owner within the boundaries of our state who would be expected to follow our laws, rules and polices.</p> <p>See attached PDF file for more description</p>	
<i>Staff Comments by:</i> Forest Resource	ODF staff has been engaged with the Federal Forestlands Advisory Committee (FFAC) creating recommendations for changes in federal land management policy. The FFAC report recognizes that we need a national policy that recognizes the interdependence of environmental,	



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Planning	social, and economic values – across public and private forest landscapes. Without this, we will continue to struggle with boundaries, constraints, and conflicting laws. What we need is a unified goal that makes sustainable forests a national core public policy commitment. The FFAC report calls for federal legislation on a par with the federal Farm Bill or Energy Bill, that establish a comprehensive framework for reviewing forest conditions and making decisions. This recommendation has been sent to the Oregon Congressional Delegation, and ODF will continue to avocate for a comprehensive forest sustainability bill.
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Beeler, Ken		Category: 4a. Outside Board Purview
Issue: 9	Title: Fire Crew Staffing Requirements	Subject: Fire - Crew Contracting
<i>Description</i>	<p>Issue Description: I was born in Astoria, Oregon and my parents worked in the woods of Oregon. I have always been proud to tell people as I travel around the world that I am from this great state. But as of the last few years, I am hesitant to say that I am.</p> <p>We usually have the highest unemployment, our roads are a mess. Gas prices were nearly the highest also. I could go on and on but I feel the reason is poor management of our state.</p> <p>I have always been proud of our forrests and the management of them as well but, I am really ticked off when I learn that we have illegal aliens on the fire crews and that you have to be fluent in spanish to be hold a leadership position. I guess I do not understand the meaning of the word "Illegal". I am not sure how I will deal with this issue but I do know that the 100 + people in my e-mail address book will be receiving a copy of this letter and will get a lot more correspondace in the future.</p> <p>Thank you for allowing me to be heard. Please do not ignore this issue.</p>	
<i>Staff Comments by:</i> Protection from Fire	<p>This issue is related to a requirement in the Interagency Firefighting Crew Agreement (IFCA). ODF and it's partner federal and state agencies in Oregon and Washington contract with private companies to supply fire crews. Because English is the official language of firefighting in the U.S. all crew supervisors must be fluent in English. For safety and effectiveness reasons, crew supervisors must also be fluent in the language of any crew member who does not speak English. The crew companies are private businesses and can choose whom they hire for their crews. But if a company elects to hire employees that do not speak English then the IFCA requires supervisors to be able to communicate with them in their language. Like other employers, the contract crew companies are bound by federal law to verify that their employees have the right to work in the U.S.</p> <p>This issue started from an erroneous media report in 2006. ODF staff will continue to communicate this message as opportunities arise.</p>	

Beezhold, Maureen		Category: 2. Addressed in Current Work Plan
Issue: 35	Title: Pesticides Toxic Effects	Subject: Forest Practices - Pesticides
<i>Description</i>	<p>I am writing to express concern about the continued use of herbicides/pesticides in Oregon forests. The human toxicology models are being reevaluated as evidence is mounting that even small amounts of these chemicals can be carcinogenic, endocrine disruptors and just plain toxic</p>	



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to all living cells, human and other species. We don't know the effects of some of these chemicals as they have not been adequately tested. It is also impossible to know the effects that are caused by the combination of exposures as testing for these are logistically and financially impossible. Please consider using these chemicals only after the science has actually shown that these are not harmful to humans and other living creatures.

Staff Comments by: See staff response, General Concern about Pesticides, issue ID # 11

Private Forests See staff response, Pesticide Literature Review and Use of Best Available Science, issue ID # 22

See staff response, Public Health, issue ID # 20

Bell, Gloria		Category: 4a. Outside Board Purview
Issue: 106	Title: BOF Conflict of Interest - Bell, Gloria	Subject: Board of Forestry
Description	BOF members should not have financial conflict of interest.	
Staff Comments by:	Please refer to issue 16	
Agency Affairs		

Bell, Gloria		Category: 2. Addressed in Current Work Plan
Issue: 107	Title: Pesticide Use - Bell, Gloria	Subject: Forest Practices - Pesticides
Description	Buffer zone between pesticide spray and people's homes. Also a buffer zone between spraying and rivers and lakes.	
Staff Comments by:	See staff response, General Concern about Pesticides, issue ID # 11	
Private Forests	See staff response, Buffers for Pesticide Application, issue ID # 20	

Bell, Gloria		Category: 2. Addressed in Current Work Plan
Issue: 108	Title: Clearcutting - Bell, Gloria	Subject: Forest Practices - Landslides
Description	No clear cut around roads and highways. We have too many mud slides in the winter.	
Staff Comments by:	Landslides and Public Safety (roads and highways)	
Private Forests	ORS 527.710(10) directs the Board to adopt rules to reduce the risk of serious bodily injury or death caused by a rapidly moving landslide directly related to forest practices. In response to that direction, the Board adopted the Shallow, Rapidly moving Landslides and Public Safety Rules (OAR 629-623). Where the downslope public safety risk is rated as "substantial," the rules prohibit harvesting or road construction on steep slopes above roads or inhabited buildings. The rules limit harvesting and forest road construction where the risk is considered intermediate. The Board is currently reviewing the Landslide and Public Safety Rules with	



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regard to acceptable risk levels and implementation of the shared risk concept identified in ORS 195.253. The review is identified in the current Private Forests Work Plan (IBI 3, topic 3) as well as in the Private Forestlands Issue Paper the Board is currently developing.

Bell, Jimmy		Category: 2. Addressed in Current Work Plan
Issue: 51	Title: Pesticide Use - Bell, Jimmy	Subject: Forest Practices - Pesticides
<i>Description</i>	We need a buffer zone to stop spraying too close to homes and schools.	
<i>Staff Comments by:</i>	See staff response, Buffers for Pesticide Application, issue ID # 20	
Private Forests		

Bell, Jimmy		Category: 4a. Outside Board Purview
Issue: 52	Title: Pesticide Use - Bell, Jimmy	Subject: Board of Forestry
<i>Description</i>	The next issue is that BOF members should not have financial conflicts of interest.	
<i>Staff Comments by:</i>	Please refer to Issue 16.	
Forest Resource Planning		

Brauer, Aen		Category: 2. Addressed in Current Work Plan
Issue: 96	Title: Pesticide Use - Brauer	Subject: Forest Practices - Pesticides
<i>Description</i>	To Whom It May Concern (which is all of us), I am writing to ask that you stop using all pesticides (herbicides) ASAP. Till then please set up a buffer zone around all home, schools, etc.	
<i>Staff Comments by:</i>	See staff response, Buffers for Pesticide Application, issue ID # 20	
Private Forests		

Brauer, Aen		Category: 4a. Outside Board Purview
Issue: 97	Title: BOF Conflict of Interest - Brauer	Subject: Board of Forestry
<i>Description</i>	Please ensure that all members of the Bureau of Forestry do not have any financial conflicts of interest.	
Thank you for your prompt attention of these.		



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<i>Staff Comments</i> by: Agency Affairs	Please refer to issue 16
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<i>Bucolo, Ollie</i>	<i>Category: 2. Addressed in Current Work Plan</i>	
<i>Issue:</i> 117	<i>Title:</i> Pesticide Use - Bucolo	<i>Subject:</i> Forest Practices - Pesticides
<i>Description</i>	There needs to be at least 1/4 mile of buffer zone in between homes, businesses, and schoold and the clear cuts that are being sprayed.	
<i>Staff Comments</i> by: Private Forests	See staff response, Buffers for Pesticide Application, issue ID # 20	

<i>Bucolo, Ollie</i>	<i>Category: 4a. Outside Board Purview</i>	
<i>Issue:</i> 118	<i>Title:</i> BOF Conflict of Interest - Bucolo	<i>Subject:</i> Board of Forestry
<i>Description</i>	End the financial conflict of interest on the Oregon Board of Forestry.	
<i>Staff Comments</i> by: Agency Affairs	Please refer to issue 16	

<i>Bucolo, Ollie</i>	<i>Category: 3. General Comments Not Related to Specific Work Plan</i>	
<i>Issue:</i> 119	<i>Title:</i> Clearcutting - Bucolo	<i>Subject:</i> Forest Practices - Clearcutting
<i>Description</i>	Clear cutting needs to stop. The practices of selective cutting, thinning, and replanting of several native tree and shrub species should be implemented in place of the planting of ony the monocrop Doug Fir species.	
<i>Staff Comments</i> by: Private Forests	See staff response, stop clearcutting, Issue #67	

<i>Capizzi, Liz</i>	<i>Category: 2. Addressed in Current Work Plan</i>	
<i>Issue:</i> 179	<i>Title:</i> Pesticides and Waterways - Capizzi	<i>Subject:</i> Forest Practices - Pesticides
<i>Description</i>	<p>Herbicide use in our watersheds is one of my main concerns...</p> <p style="padding-left: 40px;">In the Willamette R. drainage thousands of people rely on the river for drinking water. How can we stop or reduce using herbicide on the timberlands so people like me don't get cancer from the herbicide (and the white paper mills). Especially the dioxin containing ones.</p>	



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	<p>Carcinogens being put on our watershed is not acceptable. Management of new plantings / site preparation like controlled burning and spot spraying could help. More emphasis could be on waiting for the dry weather so herbicide stays out of waterways. Can we use other chemicals with less harmful affects? Many plants will die from being sprayed with vinegar, for example.</p>
<i>Staff Comments by:</i>	See staff response, Pesticide Monitoring, issue ID # 23
Private Forests	See staff response, Pesticide Literature Review and Use of Best Available Science, issue ID # 22
	See staff response, Public Health, issue ID # 20

<i>Centala, Maxine</i>	<i>Category: 2. Addressed in Current Work Plan</i>	
Issue: 37	Title: Resolve Health Issues	Subject: Forest Practices - Pesticides
<i>Description</i>	<p>We are a nonprofit group of about 60 individuals concerned with air quality from the standpoint of both human health and ecosystem health.</p> <p>Herbicides and other pesticides drift off the target sites and can travel long distance on air currents, affecting people, pets and wildlife, including salmon. We recommend that ODF use the best available science to guide policies for aerial application of herbicides, as follows:</p> <p>See PDF for remainder of text.</p>	
<i>Staff Comments by:</i>	See staff response, General Concern about Pesticides, issue ID # 11	
Private Forests	See staff response, Buffers for Pesticide Application, issue ID # 20	
	See staff response, Pesticide Literature Review and Use of Best Available Science, issue ID # 22	
	See staff response, Pesticide Monitoring, issue ID # 23	
	See staff response, Public Health, issue ID # 20	

<i>Cordray, Kristin</i>	<i>Category: 2. Addressed in Current Work Plan</i>	
Issue: 104	Title: Pesticide Use - Cordray	Subject: Forest Practices - Pesticides
<i>Description</i>	A buffer zone is needed to STOP pesticide spraying around homes, schools, churches, anywhere people are residing.	
<i>Staff Comments by:</i>	See staff response, Buffers for Pesticide Application, issue ID # 20	
Private Forests		



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<i>Cordray, Kristin</i>		<i>Category: 4a. Outside Board Purview</i>
<i>Issue: 105</i>	<i>Title: BOF Conflict of Interest - Cordray</i>	<i>Subject: Board of Forestry</i>
<i>Description</i>	BOF members should not have financial conflict of interest PERIOD. Thank you, hope to see change.	
<i>Staff Comments by:</i>	Please refer to issue 16 Agency Affairs	
<i>Crocker, Alena</i>		<i>Category: 2. Addressed in Current Work Plan</i>
<i>Issue: 76</i>	<i>Title: Pesticide Use - Crocker, Alena</i>	<i>Subject: Forest Practices - Pesticides</i>
<i>Description</i>	To whom it may concern, I am a concerned Oregon resident suggesting that there be a legal and substantial buffer zone to end the spraying of pesticide anywhere near homes or schools. Thank you for taking my belief into account.	
<i>Staff Comments by:</i>	See staff response, Buffers for Pesticide Application, issue ID # 20 Private Forests	
<i>Crocker, Avana</i>		<i>Category: 2. Addressed in Current Work Plan</i>
<i>Issue: 47</i>	<i>Title: Pesticide Use - Crocker Avana</i>	<i>Subject: Forest Practices - Pesticides</i>
<i>Description</i>	We need a buffer zone on how close pesticide can be sprayed next to a home or school.	
<i>Staff Comments by:</i>	See staff response, Buffers for Pesticide Application, issue ID # 20 Private Forests	
<i>Crocker, Avana</i>		<i>Category: 4a. Outside Board Purview</i>
<i>Issue: 48</i>	<i>Title: BOF Conflict of Interest - Crocker, Avana</i>	<i>Subject: Board of Forestry</i>
<i>Description</i>	Nobody on the BOF should have financial conflict of interest.	
<i>Staff Comments by:</i>	Please refer to issue 16 Agency Affairs	



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Crocker, Bowen		Category: 2. Addressed in Current Work Plan
Issue: 77	Title: Pesticide Use - Crocker, Bowen	Subject: Forest Practices - Pesticides
Description	Please don't spray, make a buffer zone at school and homes!!	
Staff Comments by: Private Forests	See staff response, Buffers for Pesticide Application, issue ID # 20	

Crocker, Neila		Category: 2. Addressed in Current Work Plan
Issue: 134	Title: Pesticide Use - Crocker, N	Subject: Forest Practices - Pesticides
Description	We need a buffer zone to protect our families and friends from timber areal helicopter sprays of herbicide near homes and schools.	
Staff Comments by: Private Forests	See staff response, Buffers for Pesticide Application, issue ID # 20	

Crocker, Neila		Category: 4a. Outside Board Purview
Issue: 135	Title: BOF Conflict of Interest - Crocker, N	Subject: Board of Forestry
Description	BOF members should not have conflict of interest. Thank you for your part of protecting our future.	
Staff Comments by: Forest Resource Planning	Please refer to Issue 16.	

Crooky, Sheryl		Category: 2. Addressed in Current Work Plan
Issue: 57	Title: Pesticide Use - Crooky	Subject: Forest Practices - Pesticides
Description	We need a buffer zone to stop spraying pesticide near homes. Many people and animals may and do become sickened from pesticide chemicals, and this needs to be heavily considered at all times.	
Staff Comments by: Private Forests	See staff response, Buffers for Pesticide Application, issue ID # 20 See staff response, Public Health, issue ID # 20	



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Crooky, Sheryl		Category: 4a. Outside Board Purview
Issue: 58	Title: BOF Conflict of Interest - Crooky	Subject: Board of Forestry
Description	BOF members should not have financial conflict of interest. The truth of any decision that concerns the public (people, animals, and the land) now; and the future effects of[??] should be made, clear of even the hint of corruption through profiteering.	
Staff Comments by: Agency Affairs	Please refer to issue 16	

Crooky, Sheryl		Category: 1b. New Topic: Incorporate Input Into Existing Work Plan
Issue: 59	Title: Diverse Forests - Crooky	Subject: Forest Practices - General
Description	The return, and continueing effort of planting diverse, indigenous plants of the north-west in their native territory.	
Staff Comments by: Private Forests	Diverse forests, native plants; no monocultures The Board is dealing with this issue in three ways. First, forest practice regulations support diversity and native species. The Reforestation Rules allow landowners to count only native tree species to meet reforestation requirements after harvesting unless ODF approves a plan for alternate practices. The Reforestation Rules also encourage landowners to plant with a mix of desirable species to support forest diversity. The Water Protection Rules require retention of vegetation near streams and other waters; diversity of tree species is often higher in these areas. Second, the Board relies on a strategy of different landowners playing different roles regarding forest diversity and other issues. Some landowners focus more on one tree species (although they still often use a mix of species), while others want a broader mix. Most forest landowners use tree species native to the local area. Finally, the Board recognizes that a comprehensive, statewide, all-land use native plant and animal conservation strategy is needed. The need is identified in the FPFO (Strategy E), and the Board is considering the issue as it reviews the Private Forestlands Issue Paper, which may lead to inclusion of the issue in the Private Forests Work Plan. As part of this review, the Board is also considering the question of whether conversion of some forests to simplified plantations presents challenges to sustainable forestry.	

Crooky, Sheryl		Category: 3. General Comments Not Related to Specific Work Plan
Issue: 60	Title: Clearcut - Crooky	Subject: Forest Practices - General
Description	0% clear-cut of ancient forests & trees.	
Staff Comments by: Private Forests	Protect old forests The Board relies on a strategy of different landowners playing different roles. Focusing on commercial tree production, industrial landowners tend to use the economically efficient method of clearcut harvesting, rapid regeneration, and harvesting again at 30-50 years. Federal and state forest plans tend to retain older trees. As a group, family forestland owners have a wide variety of objectives and practices, including harvesting on various rotation schedules, retaining older trees, or harvesting rarely or not at all.	



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This issue is addressed in the FPFPO but not in a specific work plan.

Cumberland, Emerald Rose	Category: 2. Addressed in Current Work Plan
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Issue: 68	Title: Pesticide Use - Cumberland	Subject: Forest Practices - Pesticides
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<i>Description</i>	This is regarding this year's Issue Scan. I disagree with pesticides being sprayed near homes, schools, farms, and water supplies. Please put a buffer zone in place.
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<i>Staff Comments by:</i>	See staff response, General Concern about Pesticides, issue ID # 11
Private Forests	See staff response, Buffers for Pesticide Application, issue ID # 20

Cumberland, Emerald Rose	Category: 4a. Outside Board Purview
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Issue: 69	Title: BOF Conflict of Interest - Cumberland	Subject: Board of Forestry
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<i>Description</i>	Also financial conflict of interest should not be allowed of BOF members. Thank you.
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<i>Staff Comments by:</i>	Please refer to issue 16
Agency Affairs	

Cumberland, Emerald Rose	Category: 1b. New Topic: Incorporate Input Into Existing Work Plan
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Issue: 70	Title: Clearcutting - Cumberland	Subject: Forest Practices - General
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<i>Description</i>	Lastly, large monoplanting when clear cutting is not a good solution. Will you use native forest trees instead?
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<i>Staff Comments by:</i>	See staff response, Diverse forests, native plants; no monocultures, Issue ID # 59
Private Forests	

Cvar, Joanne	Category: 2. Addressed in Current Work Plan
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Issue: 183	Title: Spraying in Urban Areas - Cvar	Subject: Forest Practices - Pesticides
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<i>Description</i>	As a long-time resident of Oregon (since 1948), I am writing to express my concern at the increasing incidence of forestry pesticide sprays, especially aerial sprays, in areas abutting rural residences and even urban areas. As the timber resource becomes depleted in remote areas, logging operations are moving closer to populated areas, exposing residents against their will to pesticide drift and smoke from slash-burning containing toxic ingredients.
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I live within the city limits of Waldport, yet a logging site not 1/3 mile from my home and neighborhood is slated for repeated applications of herbicides as site preparation for replanting and brush control into the indefinite future. Forest Capital Partners, who own the property, have said that due to community, city, port, and county concerns about their plan for aerial spraying in this extremely sensitive area, their "intent" is now to do ground applications instead, beginning this July or August.

We collected approximately 200 signatures in our Waldport neighborhood asking that they reconsider the use of helicopters to spray this site. We were concerned about the health of the many children in the immediate neighborhood, the elderly and people with asthma, as well as of our pets and gardens. The company has already sprayed with helicopters a site to the south just across the street from the Crestview elementary and middle schools that serve all of South Lincoln County. Additionally, the Waldport city water treatment facility is located adjacent to the logging site, with a large open sediment basin. About eight properties directly abut the site, including a horse-breeding operation and an organic nursery. This steep 120-acre hillside site also abuts Lint Creek, a protected salmon-bearing stream feeding into Alsea Bay. Runoff of pesticide into the stream is inevitable, as several gullies indicate.

In discussing this situation with the FCP area forester and with the State Forestry staff in Toledo, we were told repeatedly that "it's the law," that ours is not a "smoke-sensitive receptor area," and that "this is just standard practice." I submit that these standard practices must be modified now that there is a close interface between logging operations and vulnerable populations.

For you information, I refer you to:
 Spray Drift of Pesticides
 Current as of: December 1999 EPA: 735F99024
<http://www.epa.gov/pesticides/factsheets/spraydrift.htm>

Alaska Community Action on Toxics:
<http://www.akaction.org/PDFs/axnalert.pdf>

The Synergistic Toxicity of Pesticide Mixtures: Implications for Risk Assessment and the Conservation of Endangered Pacific Salmon
 Cathy A. Laetz, David H. Baldwin, Tracy K. Collier, Vincent Hebert, John D. Stark, and Nathaniel L. Scholz
 doi: 10.1289/ehp.0800096 (available at <http://dx.doi.org/>) Online 14 November 2008

Staff Comments See staff response, General Concern about Pesticides, issue ID # 11
by:
 Private Forests See staff response, Public Health, issue ID # 20

DeMoll, Christine		Category: 3. General Comments Not Related to Specific Work Plan
Issue: 30	Title: No Public Lands Logging	Subject: Forest Practices - Clearcutting
Description	DO NOT ALLOW CLEARCUTTING OR ANY MORE LOGGIN ON PUBLIC LANDS.	



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<p><i>Staff Comments by:</i> Forest Resource Planning</p>	<p>This comment is interpreted as a request for an end to commercial timber harvesting and particularly the practice of clearcut harvesting on federal, state, and local public forests in Oregon. Through the Forest Practices Act, the Board of Forestry has the authority to regulate clearcutting on non-federal forestlands and currently does so by addressing size and adjacency limits. The Board has direct authority over management practices on State Forests and the ability to indirectly influence federal forest management policies.</p>
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DeMoll, Christine		Category: 2. Addressed in Current Work Plan
Issue: 32	Title: No Pesticide Use	Subject: Forest Practices - Pesticides
<i>Description</i>	DO NOT SPAY EVERY AGAIN. DO NOT SPRAY PESTICIDES, HERBICIDES OR ANY TOXINS IN THE FOREST.	
<i>Staff Comments by:</i> Private Forests	See staff response, General Concern about Pesticides, issue ID # 11	

Denison, Marcia		Category: 3. General Comments Not Related to Specific Work Plan
Issue: 192	Title: Improvement Management - Denison	Subject: State Forests - General
<i>Description</i>	<p>Below are recommendations of great importance for the future of Oregon’s State Forests. They are inseparably rooted in the continual creation of this magnificent resource which has spanned over 300 million years in its development. We must always protect and enhance the soils and water sources, and encourage ecosystems to flourish.</p> <p style="padding-left: 40px;">You must balance these assets wisely, not send them to the chopping block with clear-cutting and herbicide. Don’t kill the Golden Goose! Nurture it, and gather it’s beneficial golden eggs until the end of time.</p> <p>I. SAVE THE SOIL</p> <p style="padding-left: 40px;">Use logging techniques that don’t contribute to sliding, erosion or cave in. Avoid and buffer slide prone slopes. They add to the ecosystems and maintain upper water table.</p> <p>II. SMALLER CLEAR-CUTS</p> <p style="padding-left: 40px;">Clear-cutting must be small patches 20 acres or less. NO HERBICIDE! Leave more leave trees. Natural shading limits vegetation growth, making trees grow tall faster. Herbicide kills micro-organisms preventing nutrient brake down for growth. Fertilization is causing dead zones off the coast and clogs the rivers with algae bloom. Yuck!!</p> <p>III. SAVE THE ECOSYSTEM</p> <p style="padding-left: 40px;">Ecosystems are the gardeners of healthy, productive forests. Clear-cuts destroy habitat. It takes 200 years for ecosystems and soil to recover. Invasive species will take their place. Forests will no-longer grow by then. Leave all larger and heritage stumps. They store water for trees to grow and house habitat. Don’t bulldoze topsoil or burn it! It stores water, nutrients, microorganisms and fertilizing, aerating rodents.</p> <p>IV. REDUCE DISASTERS</p>	



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Increasing the rate of disasters is disastrous! Learn from the forest. It knows far more than humans. Native forests will teach you how to get the most golden eggs from your golden goose, if you don't clear-cut it all first. Stop the killing and practice organic forestry before it's too late.

SUMMARY

It is in the best interest of the people of Oregon and land trust counties to practice conservation of healthy top soil, ecosystems, clean water sources and supply, cool air, fish and wildlife by increasing and buffering buffer widths, tripling best habitat shelter left for wildlife, retaining and enhancing soil by protecting ecosystems from chemicals and erosion. Increased timber production is a result of healthy ecosystems and soils, not increased destruction.

Staff Comments
 by:
 State Forests

This commenter affirms many of the principles, vision and goals expressed in the Board of Forestry's forest management plans.

Denison, Marcia

Category: 3. General Comments Not Related to Specific Work Plan

Issue: 193

Title: Improve State Forest Management - Denison

Subject: State Forests - General

Description

Below are recommendations of great importance for the future of Oregon's State Forests. They are inseparably rooted in the continual creation of this magnificent resource which has spanned over 300 million years in its development. We must always protect and enhance the soils and water sources, and encourage ecosystems to flourish. They are the Golden Goose.

You have in your hands, the Goose Who Lays the Golden Eggs of tax revenue, jobs, fish and wildlife habitat, plentiful clean water supply, clean air, oxygen, climate control, recreation, peace, solace, relaxation, camping, exploring, hiking, fishing, flood control, photography, and even wood products. Wow!

You must balance these assets wisely, not send them to the chopping block with clear-cutting and herbicide. Don't kill the Golden Goose! Nurture it, and gather its beneficial golden eggs until the end of time.

With this in mind, I make the following statements of wise forest conservation for you to mold your policies from.

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**I. SAVE THE SOIL**

Use logging techniques that don't contribute to sliding, erosion or cave in. Avoid and buffer slide prone slopes. They add to the ecosystems and maintain upper water table.

**II. SMALLER CLEAR-CUTS**

Clear-cutting must be small patches 20 acres or less. **NO HERBICIDE!** Leave more leave trees. Natural shading limits vegetation growth, making trees grow tall faster. Herbicide kills micro-organisms preventing nutrient brake down for growth. Fertilization is causing dead zones off the coast and clogs the rivers with algae bloom. Yuck!!

**III. SAVE THE ECOSYSTEM**

Ecosystems are the gardeners of healthy, productive forests. Clear-cuts destroy habitat. It takes 200 years for ecosystems and soil to recover. Invasive species will take their place. Forests will no-longer grow by then. Leave all larger and heritage stumps. They store water



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for trees to grow and house habitat. Don't bulldoze topsoil or burn it! It stores water, nutrients, microorganisms and fertilizing, aerating rodents.

**IV. REDUCE DISASTERS**

Increasing the rate of disasters is disastrous! Learn from the forest. It knows far more than humans. Native forests will teach you how to get the most golden eggs from your golden goose, if you don't clear-cut it all first. Stop the killing and practice organic forestry before it's too late.

**SUMMARY STATEMENT**

It is in the best interest of the people of Oregon and land trust counties to practice conservation of healthy top soil, ecosystems, clean water sources and supply, cool air, fish and wildlife by increasing and buffering buffer widths, tripling best habitat shelter left for wildlife, retaining and enhancing soil by protecting ecosystems from chemicals and erosion. Increased timber production is a result of healthy ecosystems and soils, not increased destruction.

In memory of all those who have been dying of cancer from herbicide in their work place or drinking water.

Thank you,

*Staff Comments*      See staff response for issue scan ID #192.  
*by:*  
 State Forests

***Eady, Carolyn***

***Category: 2. Addressed in Current Work Plan***

***Issue:*** 188

***Title:*** Carbon Storage - Eady

***Subject:*** State Forests - General

***Description***

The collapse of the housing industry has resulted in a dramatic decline in demand for timber with devastating impacts on the industry in general and ODF in particular. At the same time the most knowledgeable scientist are saying that climate change is increasing faster than their worse case models. My understanding is that you are seriously considering changing the FMP to decrease complex structure and increase clearcuts. Add to this a near low price for timber, this strikes me as folly. You cannot solve the serious economic woes of ODF and the north Coast on the back of one of our most precious resources, especially during this time of growing global warming. I think you need to get serious about Strategy G (Carbon storage in Oregon's forests and forest products) and move more quickly to take responsible action.

***Staff Comments***  
*by:*  
 State Forests

The Board of Forestry recognizes the challenges it faces in managing its lands during an economic downturn like the State is currently experiencing. However, the Board also recognizes the importance of maintaining the timber market infrastructure, and believes its forestland management can contribute. Additionally, statute and the "greatest permanent value" rule (OAR 629-035-0020) calls for these lands to be actively managed to "provide sustainable timber harvest and revenues to the state, counties, and local taxing districts." The Department has initiated a forest carbon-stock analysis was to begin the process of estimating and accounting for carbon storage and flux on state-owned forestland. This analysis has begun as a pilot on the Clatsop State Forest.



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| <b><i>Eisler, David</i></b> |                                                                                                                                                                                                                                                                                                                     | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue: 38</b>            | <b>Title: Literature Review</b>                                                                                                                                                                                                                                                                                     | <b>Subject: Forest Practices - Pesticides</b>      |
| <i>Description</i>          | <p>The impact of herbicides on salmon is not a case of how many fish have been reported floating belly up after a tanker overturned or an applicator used the wrong formulation. These are cases of the 1960s and 1970s that form the persistent image of chemical accidents.</p> <p>See PDF for remaining text</p> |                                                    |
| <i>Staff Comments by:</i>   | <p>See staff response, General Concern about Pesticides, issue ID # 11</p>                                                                                                                                                                                                                                          |                                                    |
| Private Forests             | <p>See staff response, Buffers for Pesticide Application, issue ID # 20</p> <p>See staff response, Pesticide Literature Review and Use of Best Available Science, issue ID # 22</p> <p>See staff response, Pesticide Monitoring, issue ID # 23</p>                                                                  |                                                    |

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| <b><i>Engelmeyer, Paul</i></b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue: 23</b>               | <b>Title: Herbicides Best Avail Science</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>Subject: Forest Practices - Pesticides</b>      |
| <i>Description</i>             | <p>I would like to submit a letter of concern that ODF should be making decisions based on the best available science. There needs to be a transparent, independent, unbiased search of professional and credible research on forestry herbicides, their modes of transport through the environment, their effect on human health, on fish, and on the environment in general. Good policy is based on good science.</p> <p>While the past monitoring program may indicate the use of herbicide may be applied correctly I am concerned about runoff after first and second storm events.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                    |
| <i>Staff Comments by:</i>      | <p>Pesticides Monitoring</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                    |
| Private Forests                | <p>Pesticides would generally fall within the biennial progress report on implementation and effectiveness monitoring listed under Work Plan #1 (Strategic Planning, Implementation, and Monitoring), Intermediate Board Issue #5. The Department has conducted monitoring efforts on pesticides since the 1970's, including a period of frequent grab sampling below spray operations between 1980-1987, specific monitoring projects occurring in 1992, 1993, and 2000, and a pesticides best management practice (BMP) compliance element within a larger BMP study in 2002. The Private Forests Monitoring Unit follows the priorities identified in the 2002 Forest Practices Monitoring Program Strategic Plan. Five of 89 identified monitoring priorities pertain specifically to pesticides and range from top to low in priority. Based on this Strategy and the rule mandate to evaluate the effectiveness of the riparian water protection rules (OAR 629-635-0110), the Private Forests Monitoring Unit is currently dedicated to analyzing the effectiveness of Forest Practices Act (FPA) riparian buffers relative to the Department of Environmental Quality (DEQ) standards for stream temperature. In keeping with the requirements of OAR 629-620-0700 relating to the coordinated evaluation of the effectiveness of FPA chemical rules, the Monitoring and Policy unit personnel are also engaged in the</p> |                                                    |



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following initiatives:

- Pesticide Management Plan for Water Quality Protection: Establishes an interagency team and a process for preventing and responding to monitoring detections of pesticides in Oregon's ground and surface water resources.
- DEQ Toxics rulemaking: Department personnel are acting in an advisory role to the committee responsible for revising water quality rules for toxics based on the recently increased fish consumption rate.
- South Yamhill Pesticide Stewardship Partnership (PSP): The Department is coordinating voluntary forest landowner participation in DEQ's landscape-scale pesticides monitoring, a key question identified in the 2002 Private Forests Monitoring Strategy.
- Interagency Pesticide Analytical Response Center (PARC): PARC members are mandated to collect suspected pesticide incident information, mobilize investigations, identify trends and patterns of problems, make policy or other recommendations for action, report results of investigations, and report to the legislature.

The Department will also work with DEQ as it progresses on the Toxins Reduction Strategy and Senate Bill 737, in which the Toxics rulemaking effort plays a role. This is a key opportunity for collaborative pesticides monitoring and to identify reduction opportunities. Given the landscape-level use of pesticides and the potential for cumulative, synergistic, or additive effects, collaborative efforts are a priority.

See staff response, Pesticide Literature Review and Use of Best Available Science, issue ID # 22

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| <b>Flynn, Susan</b>                          |                                                                                                                                                          | <b>Category:</b> 2. Addressed in Current Work Plan |
| <b>Issue:</b> 112                            | <b>Title:</b> Pesticide Use - Flynn                                                                                                                      | <b>Subject:</b> Forest Practices - Pesticides      |
| <i>Description</i>                           | I'd like an end to the spraying of herbicides in the forests of Oregon. At the very least a quarter mile buffer zone from homes, schools, private lands. |                                                    |
| <i>Staff Comments by:</i><br>Private Forests | See staff response, Buffers for Pesticide Application, issue ID # 20                                                                                     |                                                    |

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| <b>Flynn, Susan</b>                         |                                                                                                 | <b>Category:</b> 4a. Outside Board Purview |
| <b>Issue:</b> 113                           | <b>Title:</b> BOF Conflict of Interest - Flynn                                                  | <b>Subject:</b> Board of Forestry          |
| <i>Description</i>                          | Would like to see an end to the financial conflict of interest on the Oregon Board of Forestry. |                                            |
| <i>Staff Comments by:</i><br>Agency Affairs | Please refer to issue 16                                                                        |                                            |



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| <b>Flynn, Susan</b>                          |                                                    | <b>Category: 3. General Comments Not Related to Specific Work Plan</b> |
| <b>Issue:</b> 114                            | <b>Title:</b> Diverse Forests - Flynn              | <b>Subject:</b> Forest Practices - General                             |
| <b>Description</b>                           | Old Growth forests must be protected.              |                                                                        |
| <b>Staff Comments by:</b><br>Private Forests | See staff response, protect old forests, Issue #60 |                                                                        |

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|-------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| <b>Ford, David</b>                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 202                                     | <b>Title:</b> Narrow Programs                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Subject:</b> Board of Forestry                  |
| <b>Description</b>                                    | <p>It is clear that in these times of significantly reduced budgets, the Board of Forestry must narrow its focus to critical core issues. Over the past several decades, the Department of Forestry (ODF) has seen an expansion of its responsibilities and programs well beyond its founding mission. ODF will not have the money or personnel to continue business as usual. Thus, we urge the Board to narrow its focus to a limited number of critical core issues.</p> <p>Further, we recommend the Board of Forestry improve and streamline its decision making process. Thus, we applaud the Board's recent use of voting as a way to resolve irreconcilable differences over policy decisions so that decisions can translate into action in a reasonable timeframe.</p> |                                                    |
| <b>Staff Comments by:</b><br>Forest Resource Planning | <p>Budgets can be viewed as a tool by which strategic planning is implemented. The department's budget, the issue scan process, and comments such as this one play important roles in helping the Board of Forestry determine its objectives and priorities for near term (two-years) work and in developing Work Plans to accomplish those objectives and priorities. At the same time, the Forestry Program for Oregon goals and the Oregon Indicators of Sustainable Forest Management provide a longer-term strategic vision for the future of forestry in Oregon that the Board continues to strive for, updating as needed over time.</p>                                                                                                                                  |                                                    |

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| <b>Ford, David</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 203  | <b>Title:</b> Maintain Fire Suppression as Highest Priority                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <b>Subject:</b> Fire - General                     |
| <b>Description</b> | <p>Strategies that can help keep forestland in forests include:<br/>         Protecting Private Lands From Wildfire - Family forestland owners rely on ODF to be their fire department. Private forestland owners are financially vested partners with ODF to help insure that fire prevention and suppression activities are effective. Private landowners and the citizens of this state can not afford the economic loss and the environmental damage caused by catastrophic wildfires.</p> <p>We recommend that prevention and suppression of wildfires remain the highest priority of ODF.</p> |                                                    |



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| <i>Staff Comments by:</i><br>Protection from Fire | This issue is a recommendation to keep prevention and suppression of wildfires as the highest priority of ODF. The protection of Oregon's valuable forests through the prevention and suppression of forest fires remains the department's top priority. This designation is contained in Oregon Revised Statutes and continues to be emphasized by the Oregon Legislature by providing sufficient funds to maintain an adequate level of protection. The Board has identified the importance of fire protection in the Forestry Program for Oregon, Strategy F. |
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| <b>Ford, David</b>                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 205                            | <b>Title:</b> Prioritize Use of Incentives                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <b>Subject:</b> Forest Practices - General         |
| <i>Description</i>                           | <p>Prioritize Incentives Rather Than Regulatory Approaches - Generally, family forestlands are small and thus they often require unique approaches to management, regulation and landowner assistance. The families who own these properties have committed significant financial resources to a high-risk investment in forestland that matures over a very long period of time. Often entire savings for retirement and education of children are tied up in a family's forestland investment. Family forest management is a stewardship enterprise, and many benefits (wildlife habitats, clean water, clean air, open space, etc.) accrue to society at no cost to them. The opportunity for family landowner profits come primarily from the harvest of timber or other forest products. In the future, we envision an array of ecosystem services will generate cash-flow for forestland owners that will supplement their income. To recognize and provide for the unique needs of family forestland owners, the Board should focus on creating incentives for sustainable management-related activities rather than more regulation. We recommend that the Board develop and institute incentive-based approaches that will lead to responsible management by family woodland owners rather than control and command through excessive regulations.</p> |                                                    |
| <i>Staff Comments by:</i><br>Private Forests | <p>Prioritize Incentives for Sustainable Management<br/>The Board recognizes the importance of this issue in the Work Plan 6 Private Forests, IBI 2, although the issue is not currently addressed in one of the specific topics for that IBI. The Board is considering the issue in more depth in its Private Forestlands Issue Paper being developed in relation to Work Plan 6.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                    |

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|--------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| <b>Ford, David</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 207  | <b>Title:</b> Support Strong Industry                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <b>Subject:</b> Maintain Working Forests           |
| <i>Description</i> | <p>Strategies that can help ensure the long-term economic viability of private forestlands include: Prioritize Investments to Support a Strong and Diverse Forest Products Industry - Family forestland owners recognize that a strong and diverse forest products industry is necessary for producing income from their forestlands, which in turns supports their ability to actively manage their lands. The infrastructure that is required for a viable forest products industry relies a continuous source of raw materials. All forest owners (large and small) are needed to contribute to this source of raw materials. When their sources diminish, mills and supporting services such as logging contractors disappear. It is essential that mills remain open and supporting services continue to be available in order to</p> |                                                    |



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maintain viable market options for family forestland owners. The Board should adopt polices and take actions that will ensure that the State of Oregon remains a net exporter of forest products and a strong contributor to the Nation's demand for forest products. We recommend that the Board prioritize investments that support a strong and diverse forest products industry throughout the statue so Oregon can remain a net exporter of forest product to the nation and the world.

*Staff Comments*  
by:  
Private Forests

**Support a Strong Forest Industry**  
The Board recognizes that a strong forest industry is critical to sustainable forest management in Oregon. The Board is considering a potential policy objective related to this issue in its Private Forestlands Issue Paper, which is being developed under the Primary Issue in Work Plan 6 Private Forests.

Through the Forest Vitality Work Plan, IBI 1, the Board is promoting the development and implementation of an Oregon forest cluster economic development strategy.

**Ford, David**

**Category: 2. Addressed in Current Work Plan**

**Issue:** 208

**Title:** Support Ecosystem Markets

**Subject:** Maintain Working Forests

*Description*

Prioritize Investments to Develop and Support Ecosystem Services Markets - Family forestland owners are seeking opportunities to diversify income streams from their lands. Emerging ecosystem services markets offer family forestland owners potential new income sources. Last year, OSWA formed Woodlands Carbon to aggregate and trade sequestered carbon credits from certified family woodland owners in the western United States. The aim is to create yearly revenue for family woodland owners from carbon markets. A key objective is to help families justify their continued ownership so there is no net loss of family-owned forestland in the state. We recommend that the Board prioritize investments that support the development of ecosystem services markets that will benefit family forestland owners.

*Staff Comments*  
by:  
Private Forests

**Support Ecosystem Services Markets**  
The Board recognizes that the marketing of ecosystem services could be a critical element in supporting sustainable forest management on family forestlands. The Board is addressing this issue in Work Plan 6 Private Forests, IBI 2, in which it has directed the Department to pilot family forestland conservation easements under the Bonneville Power Administration grant program. The Board is considering an expanded policy objective related to this issue in its Private Forestlands Issue Paper, which is being developed in connection with Work Plan 6 Private Forests.

**Ford, David**

**Category: 2. Addressed in Current Work Plan**

**Issue:** 209

**Title:** Equitable Suppression Funding

**Subject:** Fire - Funding

*Description*

ODF's world-renowned wildfire suppression program is built on the concept of shared responsibility between the state and private forest landowners. However, the goal of splitting costs 50-50 has proven elusive in recent years, with landowners bearing a much larger share of the burden than the state. Even at 50-50, the landowner share would still be higher than any other state. Today, in some parts of the state, landowners are now paying more in fire assessments than they are in property taxes.



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| <p><i>Staff Comments by:</i><br/>Protection from Fire</p> | <p>This funding system is severely broken because the State of Oregon has reneged on paying its share of cooperative forest fire protection. And this situation is untenable for family forestland owners. Thus, the Board should promote fair and equitable forest protection funding at both the statutory and administrative levels. We recommend that the Board advocate for fair and equitable forest protection funding before the legislature, administration and the public.</p> <p>This issue is related to funding for the Protection From Fire Program. In the Forestry Program for Oregon, Strategy "F", the board promotes "...shared landowner and public funding to maintain the most efficient level of fire protection...".</p> |
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| <b>Ford, David</b>                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 210                            | <b>Title:</b> Identify New Private Forests Funding                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>Subject:</b> Forest Practices - General         |
| <i>Description</i>                           | <p>Funding to support ODF's private forestry program continues to decline due to increased competition for general fund dollars among other state agency programs. It is unlikely that a greater share of general funds will be available to the private forestry program in future years, especially during these weak economic times. Thus, the Board should focus on identifying new sources of stable funding to support private forestry programs.</p> <p>There is a growing need to provide landowner assistance to a greater number of family forestland owners, due to the increasing number of new landowners in the state. Many of these new landowners are inheriting land from their parents or grandparents and need assistance in how to steward their forests. Investing in these new landowners will help improve forest conditions over time and will create economic growth through the sale of forest products - including emerging ecosystem services such as carbon and water.</p> <p>In addition, family forestland owners offer the greatest opportunity to help ensure that the State of Oregon remains a net exporter of forest products, as they have the greatest untapped potential to contribute raw materials from their lands for manufacturing.</p> <p>We recommend that the Board identify and secure new and stable funding mechanisms for the private forestry program.</p> |                                                    |
| <i>Staff Comments by:</i><br>Private Forests | <p>Funding for the Private Forests Division; Reassure the Public</p> <p>The Board recognizes the need for stable, adequate funding for the Private Forests Division so that staff can assist landowners in sustainable forest management and to reassure the public that resources are being protected. The primary board issue in Work Plan 6 Private Forests addresses this issue, as does the Private Forestlands Issue Paper currently under review by the Board. However, the issue is not yet directly addressed in an IBI.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                    |

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|------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| <b>Forester, Susan</b> |                                                                                                                                                                                                                                                                                            | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 172      | <b>Title:</b> Limit Use - Forester                                                                                                                                                                                                                                                         | <b>Subject:</b> Forest Practices - Pesticides      |
| <i>Description</i>     | <p>I am very concerned about use and over use of pesticides in our forests and along road ways. Apparently the board was to look into this matter two years ago and nothing has been done. We cannot forever put off looking into matters like these. We are all at risk. Toxins don't</p> |                                                    |



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|                                                                           | <p>discriminate one human being from another.<br/>         Travelling around Southern Oregon recently looking at the rate of clear cutting and the inevitable soil erosion into streams, rivers and lakes one has to wonder how long fish, wildlife and the health of the waters will endure.<br/>         Please educate board members and limit your use of harmful pesticides.</p> |
| <p><i>Staff Comments</i><br/> <i>by:</i><br/>         Private Forests</p> | <p>See staff response, General Concern about Pesticides, issue ID # 11<br/>         See staff response, Public Health, issue ID # 20</p>                                                                                                                                                                                                                                              |

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| <b>Fraser-Dean, Gretchen</b>                           |                                                                      | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue: 65</b>                                       | <b>Title: Pesticide Use - Fraser-Dean</b>                            | <b>Subject: Forest Practices - Pesticides</b>      |
| <i>Description</i>                                     | We need a buffer zone to stop spraying pesticide near homes.         |                                                    |
| <i>Staff Comments</i><br><i>by:</i><br>Private Forests | See staff response, Buffers for Pesticide Application, issue ID # 20 |                                                    |

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| <b>Fraser-Dean, Gretchen</b>                          |                                                             | <b>Category: 4a. Outside Board Purview</b> |
| <b>Issue: 66</b>                                      | <b>Title: BOF Conflict of Interest - Fraser-Dean</b>        | <b>Subject: Board of Forestry</b>          |
| <i>Description</i>                                    | BOF members should not have financial conflict of interest. |                                            |
| <i>Staff Comments</i><br><i>by:</i><br>Agency Affairs | Please refer to issue 16                                    |                                            |

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|--------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|
| <b>Fraser-Dean, Gretchen</b>                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>Category: 3. General Comments Not Related to Specific Work Plan</b> |
| <b>Issue: 67</b>                                       | <b>Title: Clearcutting - Fraser-Dean</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Subject: Forest Practices - Clearcutting</b>                        |
| <i>Description</i>                                     | No clear cutting our forests.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                        |
| <i>Staff Comments</i><br><i>by:</i><br>Private Forests | <p>Stop clearcutting<br/>         The Board relies on a strategy of different landowners playing different roles. Focusing on commercial tree production, industrial landowners tend to use the economically efficient method of clearcut harvesting and rapid regeneration. Federal and state forest plans tend to focus more on selection harvesting to meet ecosystem management objectives, along with some clearcutting to meet objectives based on ecosystem management and economic return. As a group, family forestland owners have a wide variety of objectives and employ a variety of practices including clearcutting on various rotation schedules, selection harvesting, and sometimes harvesting rarely or not all.<br/>         Clearcutting, along with other harvesting methods, is regulated by the Oregon Forest Practices Act and forest practice rules to protect soil, air, water, and fish and wildlife resources. Under</p> |                                                                        |



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those regulations, landowners and operators must retain wildlife trees and down wood, promptly reforest with native tree species, avoid the entry of sediment into waters, retain trees in riparian management areas, and protect specified resource sites such as osprey nests or heron rookeries.

This issue is addressed in a general manner through ORS 527.630(1), which declares as public policy that the state encourages economically efficient forest practices, consistent with sound management of soil, air, water, and fish and wildlife resources. Although the issue is implicitly addressed in the Private Forests Work plan, it not directly mentioned in any Board work plan.

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| <b>Freshwater-Du Bois, Cathleen</b>          |                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue: 28</b>                             | <b>Title: Stop Pesticide Use</b>                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Subject: Forest Practices - Pesticides</b>      |
| <b>Description</b>                           | I feel very disturbed by the rampant use of both herbicides and pesticides in and above Oregon's forests.<br>The going slogan seems to be, "Poison anything you don't like." I am appalled by the spraying along the highways that leaves tinder along the roadsides, and by the runoff from the forests that washes poisons into watersheds. Are there neither hearts nor brains in government echelons? Stop poisoning the earth. |                                                    |
| <b>Staff Comments by:</b><br>Private Forests | See staff response, General Concern about Pesticides, issue ID # 11                                                                                                                                                                                                                                                                                                                                                                 |                                                    |

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| <b>Gaines, Brenda</b>                        |                                                                                                                                                                                                                                                                                               | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue: 27</b>                             | <b>Title: Credible Pesticide Research</b>                                                                                                                                                                                                                                                     | <b>Subject: Forest Practices - Pesticides</b>      |
| <b>Description</b>                           | There needs to be a transparent, independent, unbiased search of professional and credible research on forestry herbicides, their modes of transport through the environment, their effect on human health, on fish, and on the environment in general. Good policy is based on good science. |                                                    |
| <b>Staff Comments by:</b><br>Private Forests | See staff response, Pesticide Literature Review and Use of Best Available Science, issue ID # 22<br><br>See staff response, Pesticide Monitoring, issue ID # 23                                                                                                                               |                                                    |

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| <b>Gallob, Joel</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue: 26</b>    | <b>Title: Herbicides as Last Resort</b>                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>Subject: Forest Practices - Pesticides</b>      |
| <b>Description</b>  | You should ban or minimize use of herbicides and other toxic chemicals in Oregon forestry. Several years ago, when I wrote for the Newport News-Times, I did a 3-part series on the evidence that the widespread spraying by Forestry Dept. on the Alsea Valley some decades earlier was now reaping its harvest in cancers, lukemias, micro-encephaly, cases and etc. At least two of the three articles are still available on the News-Times web site. (search: Alsea |                                                    |



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herbicides) The evidence is strong that the use of these chemicals as anything other than a very rare resort is a very bad idea in terms of human health.

*Staff Comments* See staff response, General Concern about Pesticides, issue ID # 11  
*by:* See staff response, Buffers for Pesticide Application, issue ID # 20  
 Private Forests

***Gee, Dan and Maya*** **Category: 2. Addressed in Current Work Plan**

**Issue:** 11      **Title:** End Pesticides      **Subject:** Forest Practices - Pesticides

*Description* Dear Dan,  
 My issue in regards to Forest Practices, and the biggest, most important one is: The application of poisons (pesticides=herbicides) after clear cutting, and thereafter. I have been personally sickened by inhaling these poisons last year and know many more families and friends that have had that experience. It is totally unacceptable to poison people like that!

See PDF for remaining description.

*Staff Comments* General Concern about Pesticides  
*by:* The Department is one of five state and federal agencies responsible for varying aspects of the safe use and distribution of chemicals under state and federal law:  
 Private Forests

Agriculture (ODA)  
 Federal Insecticide, Fungicide & Rodenticide Act (FIFRA)  
 • Distribution, sale and use of pesticides in Oregon  
 • Sets standards for chemicals use in agricultural operations  
 • Enforcement of chemical applications according to product labels  
 Environmental Quality (DEQ)  
 Clean Water Act (CWA)  
 • Regulates discharges of pollutants into waters of the state and maintaining quality standards for surface waters  
 Human Services (DHS)  
 Safe Drinking Water Act (SDWA)  
 • Protect the quality of drinking water in Oregon (groundwater & surface water)  
 Forestry (ODF)  
 Forest Practices Act (FPA)  
 • Sets standards for natural resource protection in forest environments  
 • Compliance with state water quality standards (OAR 340-041-0061(11))  
 Environmental Protection Agency (EPA)  
 • Pesticide label approval  
 • Testing of effects on fish and wildlife, protection of humans and the environment  
 • Periodic product registration reviews based on monitoring and research data

The state authority to "...establish limitations and procedures deemed necessary and proper for the protection of persons..." on the uses or applications of pesticides resides within the Department of Agriculture (ODA) (ORS 634.322(6)). The regulatory authority of the Board of Forestry is further clarified in a 1995 Memorandum of Agreement with ODA to be limited to prescribing best management practices for pesticides relative to natural resources on forestlands. Maintaining the clarity of the differing regulatory roles of state agencies is highlighted in FPA statute (ORS 527.630(2)).



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Integrated pest management (IPM) is a voluntary process under which operators and landowners can choose the tools to achieve their site specific objectives (OAR 629-620-000(2)). The Department implements the IPM process through the statewide aerial insect & disease (I&D) detection and survey program, staff attendance of IPM training events and support from I&D staff, dissemination of this information to the public primarily through technical assistance, and implementation on State Forests (ORS 527.321). Non-chemical control of I&D pests is well-developed and aligned with economic goals of many landowners relative to the non-chemical control of vegetation. Cooperative efforts to monitor and implement differing IPM tools are in line with Department policy (ORS 527.710(a) &(b)).

See staff response, Public Health, issue ID # 20

**Gee, Dan and Maya**

**Category: 4a. Outside Board Purview**

**Issue: 16**

**Title: Board Composition**

**Subject: Board of Forestry**

*Description*

Another issue that needs to change is that the board of directors be switched to people that do not have the conflict of interests while making decisions.

Which way do you think will the owners of timber go? Will they protect or care about Chiloyen's family's well being? Many families have miscarried due to those poison!

We need to see the change and be the change! Better ways are coming, and through COMPASSION, people will learn to honor lives, and the most sacred gift to us all: LIFE.

Will you give back to Creator, by standing up for the truth?

Thank you,

P.S. We all reap what we sow! So therefore may all our thoughts, words, and actions GENETIC OTHERS as well as ourselves!

*Staff Comments by:*  
Agency Affairs

The comment speaks to the makeup of the Board. By state law, Board members are nominated by the Governor and confirmed by the state Senate. Paraphrasing the law, no more than three members of the Board may derive any significant portion of their income directly from activities regulated by the Board. There is no requirement that any Board members have a timber interest; rather, there is a limit on the number of such members.

Some commenters have indicated that the state Environmental Quality Commission is governed by federal provisions that prohibit individuals with conflicts of interest from serving on the commission. The EQC is subject to a specific set of provisions related to authority that the federal government has directly delegated to the commission to enforce and carry out federal laws such as the Clean Air Act.

The authority to amend state laws regarding Board of Forestry composition rests with the state Legislature, and the nomination/confirmation process itself occurs with the Governor and state Senate. Board appointments thus are not within the Board's purview.

The Board does engage with the legislative process by choosing a number of proposals, called legislative concepts, to pursue during each legislative session. Concepts from the Board and



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department, and other state agencies, are submitted to the Governor's office for review and selection of those that will be ultimately be introduced as bills. Making this issue the subject of a legislative concept would be an option if the Board so chooses.

***Gee, Dan and Maya***

***Category: 2. Addressed in Current Work Plan***

**Issue:** 61      **Title:** Pesticide Use - Gee      **Subject:** Forest Practices - Pesticides

**Description**      Stop spraying poisonous herbicides in our coastal mountains!! Create buffer zones (homes, schools, playgrounds, bus stops, etc.) (creeks, springs, lakes, etc.).

**Staff Comments by:**  
 Private Forests      See staff response, General Concern about Pesticides, issue ID # 11  
                                  See staff response, Buffers for Pesticide Application, issue ID # 20

***Gee, Dan and Maya***

***Category: 4a. Outside Board Purview***

**Issue:** 62      **Title:** BOF Conflict of Interest - Gee      **Subject:** Board of Forestry

**Description**      BOF members should not have financial conflict of interest. You must deal w/these issues and not sweep them to the side of 2008.

**Staff Comments by:**  
 Agency Affairs      Please refer to issue 16

***Gee, Dan and Maya***

***Category: 2. Addressed in Current Work Plan***

**Issue:** 63      **Title:** Pesticide Use - Gee      **Subject:** Forest Practices - Pesticides

**Description**      Stop the poisoning of our water, air and soil with the use of pesticides on our forests, so called "tree farms". Stop the use of pesticides indefinitely in all forest practices NOW!

**Staff Comments by:**  
 Private Forests      See staff response, General Concern about Pesticides, issue ID # 11

***Gee, Dan and Maya***

***Category: 4a. Outside Board Purview***

**Issue:** 64      **Title:** BOF Conflict of Interest - Gee      **Subject:** Board of Forestry

**Description**      Stop the BOF conflict of interest!

Do and live by TRUTH!



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*Staff Comments* Please refer to issue 16  
*by:*  
 Agency Affairs

**Giesy, Wayne** *Category: 2. Addressed in Current Work Plan*

**Issue:** 6      **Title:** State Involvement in Federal Lands      **Subject:** Federal Lands

*Description* Thank you for sending your request of April 8, 2009, soliciting issues we feel are vital and important for Board of Forestry action.

Wayne Giesy, Hull-Oakes Lumber, and I, representing Frank Lumber Co., Inc., have been greatly concerned about the very poor economic conditions in Rural Oregon for several years. We regularly voiced these concerns before the Federal Forestland Advisory Committee.

All forestland, whether it be private, state, or federal ownership, are vital to the economic and environmental needs of Oregon's citizens. Fifty-seven percent of the forest acreage in Oregon is owned by the Federal Government with management control basically being in Washington, D.C. The use and general well-being of these federal lands is very important to the people of Oregon, especially in the rural areas.

We believe the management of these federal lands within our state must receive more direct guidance and input about the forest conditions and management from an Oregon authority. This authority should be a Board of Forestry appointee who has experience in Silviculture and other Forestry issues as well as national political realities.

We urge the Board of Forestry begin adoption of such a program through the Oregon Legislature.

*Staff Comments* The issue calls for "direct guidance and input about forest conditions and management from an Oregon authority." The Federal Forestlands Advisory Committee recommendations include the formation of a new state program to support federal agency and local community efforts to improve forest health on federal forestlands. Local collaboratives would assess forest conditions and plan landscape scale treatments to achieve environmental, social, and economic objectives. ODF submitted a Program Option Package to create the new program, but funding is not available in the current cycle.  
*by:*  
 Forest Resource Planning

**Goes, Jim** *Category: 2. Addressed in Current Work Plan*

**Issue:** 168      **Title:** Conduct Literature Review - Goes      **Subject:** Forest Practices - Pesticides

*Description* I own a family tree farm that I manage without use of forestry herbicides or toxics.

In 2007 hundreds if not thousands of Oregonians sent comments to the BOF regarding our concerns with the widespread use of forestry herbicides and the high likelihood of chemical impacts on human health and the health of our region's ecosystems. Because of the exceptionally large number of responses the ODF staff made a recommendation to the Board that a scientific literature search would be appropriate. The Board then requested the staff to begin the literature search process.



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Two years have gone by and both the Board and the staff have chosen to not move forward. What is astounding is that the President of the Board announced that the 2009 Issue Scan is open for public input after having ignored public concerns of the 2007 Scan. Why are you not taking this seriously?

As a public agency, ODF should be making decisions based on the best available science. There needs to be a transparent, independent, unbiased search of professional and credible research on forestry herbicides, their modes of transport through the environment, their effect on human health, on fish, and on the environment in general. Good policy is based on good science.

I ask you to make good on your commitment to represent all Oregonians and Oregon tree farmers, not just the needs of big timber. Credible science is what is needed to address the declining health of our forest ecosystems. Not just more weaving and dodging and avoiding the issues.

*Staff Comments by:* See staff response, General Concern about Pesticides, issue ID # 11

Private Forests See staff response, Buffers for Pesticide Application, issue ID # 20

See staff response, Pesticide Literature Review and Use of Best Available Science, issue ID # 22

See staff response, Pesticide Monitoring, issue ID # 23

**Green, Denise**

**Category: 2. Addressed in Current Work Plan**

**Issue: 55      Title: Pesticide Use - Green      Subject: Forest Practices - Pesticides**

*Description*      We need a bufer zone to stop spraying pesticides near homes and schools.

*Staff Comments by:* See staff response, General Concern about Pesticides, issue ID # 20

Private Forests

**Green, Denise**

**Category: 4a. Outside Board Purview**

**Issue: 56      Title: BOF Conflict of Interest - Green      Subject: Board of Forestry**

*Description*      Board of forestry members should not have financial conflict of interest.

*Staff Comments by:* Please refer to Issue 16.

Forest Resource Planning



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|----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|
| <b>Harkins, Shaun</b>                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>Category:</b> 1b. New Topic: Incorporate Input Into Existing Work Plan |
| <b>Issue:</b> 182                            | <b>Title:</b> Leave Tree Bank Area                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <b>Subject:</b> Forest Practices - General                                |
| <i>Description</i>                           | <p>The Wildlife Bank Area (WBA) or Leave Tree Bank Area (LTBA) concept requires a set aside area larger than 2 acres designated for wildlife or leave tree areas. Preservation of larger areas would promote more wildlife use and allow leave trees to be left for multiple units in a group. This concept would connect riparian areas to uplands and allow for wildlife travel corridors.</p> <p>See PDF for remaining text.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                           |
| <i>Staff Comments by:</i><br>Private Forests | <p>Leave Tree Bank Area</p> <p>The proposal for banking wildlife leave trees in areas away from a specific harvest unit as a standard practice may be problematic, given the text of ORS 527.676, the relevant statute.</p> <p>This issue relates to the Private Forests Work Plan, but is not specifically mentioned in the work plan. The work plan addresses the concept of payment for ecosystem services in Intermediate Board Issue 0 (IBI 0), the primary Board issue:<br/>         “How will the Board clarify current Private Forests program policy governance—at the statutory level, Forestry Program for Oregon strategic planning level , or otherwise—to effectively address the current and emerging challenges on private forestlands in order to fully realize the Forestry Program for Oregon vision of sustainable forest management across all Oregon’s forestlands?”</p> <p>Under IBI 0, the Board is developing policy objectives for private forestlands. Policy objective 6 states: “Place a high priority on dedicating resources towards the development and support of future non-timber markets that will increase forestland value, including biomass, carbon sequestration, and other ecosystem services.”</p> <p>A tradable Wildlife or Leave Tree Bank Area could provide an ecosystem service market for trading credits associated with the services provided by leave tree requirements. The Department had not analyzed the viability of such a market.</p> <p>The Board could direct the Department to review the proposal, develop recommendations, and communicate to the Board if rule or statutory changes might be appropriate. To do this work, staff would need to shift other priorities.</p> |                                                                           |

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| <b>Heiken, Doug</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Category:</b> 2. Addressed in Current Work Plan |
| <b>Issue:</b> 12    | <b>Title:</b> Climate Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <b>Subject:</b> State Forests - General            |
| <i>Description</i>  | <p>Human induced global climate change is now widely recognized as one of the most significant issues facing humanity. The problem is excess carbon transferred to the atmosphere from other carbon pools, especially fossil fuels and forests. Forest management is thus recognized as a significant cause of greenhouse gas pollution, and forest conservation is a recognized means of carbon storage for climate mitigation.</p> <p>In the century preceding 1990 the logging industry on the westside of Oregon and Washington caused 100 times more carbon emissions from land use activities compared to the global</p> |                                                    |



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average for similar sized areas. We need to restore much of the carbon that has been lost due to past practices.

The BOF can begin addressing the issues of climate change and carbon storage by recommending significant changes to forest practices on state lands that would optimize carbon storage AND ecological resilience to climate change. Start by protecting all mature & old-growth forests and encouraging longer rotations on managed forests. Current discussions about state forests seem to center on how to increase logging on state lands, which is in direct conflict with the need for increased carbon storage.

An important part of this forest policy reform process will require integrating and harmonizing efforts to maximize carbon storage and efforts to prepare forests for climate change by making them resilient.

Please review and consider Oregon Wild's report on "Forests, Carbon & Global Warming"<http://tinyurl.com/2n96m5> Do not be confused by out-dated notions that young forests are better for carbon storage, or that wood products store carbon better than healthy forests, or that natural forest dynamics such as fire necessarily prevent forests from storing carbon. Please review this slide show clarifying many misconceptions about forests, logging, and carbon:<http://www.slideshare.net/dougoh/forest-carbon-climate-myths-presentation/>

*Staff Comments*  
by:  
State Forests

The management plans for Board of Forestry lands articulate goals and strategies for the various forest resources. The plan is founded on structure based management and includes strategies that seek to balance economic, social and environmental values. Many of the acres in the largest contiguous blocks of forestland on the Tillamook State Forests experienced a repeated cycle of large-scale forest fires in the early to mid-1900's. For this reason and due to harvesting activities during that same period, few old growth stands remain. Under the Northwest forest management plan, existing old growth is protected. Additionally, harvesting under the plan strategies results in a harvest of age of 80 years, on average, and limits clearcut harvest to about five percent of the landscape. The Department has initiated a forest carbon-stock analysis was to begin the process of estimating and accounting for carbon storage and flux on state-owned forestland. This analysis has begun as a pilot on the Clatsop State Forest.

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| <b>Hickey, Gregory</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>Category:</b> 4a. Outside Board Purview    |
| <b>Issue:</b> 184      | <b>Title:</b> Stop Pesticide Use - Hickey                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Subject:</b> Forest Practices - Pesticides |
| <i>Description</i>     | <p>It seems no one in charge of state or national forests gives a rat's ass about contaminating our forests with herbicides. Many compounds used by the USFS and BLM are known to cause cancer and or birth defects. I have looked for, but have not found any studies of area wells and how much herbicides have trickled down into them, let alone how these herbicides cause many illnesses including cancer and birth defects.</p> <p>About three years ago, Josephine County and the Oregon Department of Forestry came out to Lake Selmac and sprayed toxic herbicides on vegetation to keep it from coming back, after clearing the forest surface of unwanted small trees, such as madrone and oak. My daughter, who was visiting from North Carolina and my wife became ill after walking through the park, not knowing it had been sprayed with an atrazine-like compound a day before. When I walked through the park a few days later, I could still smell a putrid odor throughout the park.</p> |                                               |



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|                                                 |                                                                                                                                            |
|-------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|
|                                                 | The contamination our beauracracies are committing on our nation in the name of a few bucks should be illegal! Stop the use of herbicides! |
| <i>Staff Comments</i><br>by:<br>Private Forests | See staff response, Public Health, issue ID # 20                                                                                           |

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|-------------------------------------------------|------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| <b>Hill, Kristina</b>                           |                                                                                                      | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 45                                | <b>Title:</b> Pesticide Use - Hill                                                                   | <b>Subject:</b> Forest Practices - Pesticides      |
| <i>Description</i>                              | We need at least a quarter mile buffer zone on aerial spraying of pesticides near homes and schools. |                                                    |
| <i>Staff Comments</i><br>by:<br>Private Forests | See staff response, Buffers for Pesticide Application, issue ID # 20                                 |                                                    |

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| <b>Hill, Kristina</b>                          |                                                                     | <b>Category: 4a. Outside Board Purview</b> |
| <b>Issue:</b> 46                               | <b>Title:</b> BOF Conflict of Interest - Hill                       | <b>Subject:</b> Board of Forestry          |
| <i>Description</i>                             | End financial conflict of interest on the Oregon Board of Forestry. |                                            |
| <i>Staff Comments</i><br>by:<br>Agency Affairs | Please refer to issue 16                                            |                                            |

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|-------------------------------------------------|--------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| <b>Hodgson, Brad</b>                            |                                                                                                        | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 130                               | <b>Title:</b> Pesticide Use - Hodgson, B                                                               | <b>Subject:</b> Forest Practices - Pesticides      |
| <i>Description</i>                              | We need an aerial spray buffer zone around homes and schools (for pesticides) including rodent killer. |                                                    |
| <i>Staff Comments</i><br>by:<br>Private Forests | See staff response, Buffers for Pesticide Application, issue ID # 20                                   |                                                    |

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| <b>Hodgson, Brad</b> |                                                     | <b>Category: 4a. Outside Board Purview</b> |
| <b>Issue:</b> 131    | <b>Title:</b> BOF Conflict of Interest - Hodgson, B | <b>Subject:</b> Board of Forestry          |
| <i>Description</i>   | End financial conflict of interest on the B.O.F.    |                                            |



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| <i>Staff Comments</i> | Please refer to issue 16 |
| <i>by:</i>            |                          |
| Agency Affairs        |                          |

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| <b>Hodgson, Brian</b> | <b>Category: 2. Addressed in Current Work Plan</b>                          |                                               |
| <b>Issue:</b> 115     | <b>Title:</b> Pesticide Use - Hodgson, Brian                                | <b>Subject:</b> Forest Practices - Pesticides |
| <i>Description</i>    | We need an aeria spray buffer zone around homes and schools for pesticides. |                                               |
| <i>Staff Comments</i> | See staff response, Buffers for Pesticide Application, issue ID # 20        |                                               |
| <i>by:</i>            |                                                                             |                                               |
| Private Forests       |                                                                             |                                               |

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| <b>Hodgson, Brian</b> | <b>Category: 4a. Outside Board Purview</b>              |                                   |
| <b>Issue:</b> 116     | <b>Title:</b> BOF Conflict of Interest - Hodgson, Brian | <b>Subject:</b> Board of Forestry |
| <i>Description</i>    | End financial conflict of interest on the Oregon B.O.F. |                                   |
| <i>Staff Comments</i> | Please refer to issue 16                                |                                   |
| <i>by:</i>            |                                                         |                                   |
| Agency Affairs        |                                                         |                                   |

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| <b>Hodgson, Michael</b> | <b>Category: 2. Addressed in Current Work Plan</b>                           |                                               |
| <b>Issue:</b> 128       | <b>Title:</b> Pesticide Use - Hodgson, M                                     | <b>Subject:</b> Forest Practices - Pesticides |
| <i>Description</i>      | We need an aerial spray buffer zone around homes and schools for pesticides. |                                               |
| <i>Staff Comments</i>   | See staff response, Buffers for Pesticide Application, issue ID # 20         |                                               |
| <i>by:</i>              |                                                                              |                                               |
| Private Forests         |                                                                              |                                               |

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| <b>Hodgson, Michael</b> | <b>Category: 4a. Outside Board Purview</b>                                  |                                   |
| <b>Issue:</b> 129       | <b>Title:</b> BOF Conflict of Interest - Hodgson, M                         | <b>Subject:</b> Board of Forestry |
| <i>Description</i>      | End financial conflict of interest on the Oregon board of forestry (B.O.F.) |                                   |
| <i>Staff Comments</i>   | Please refer to issue 16                                                    |                                   |
| <i>by:</i>              |                                                                             |                                   |
| Agency Affairs          |                                                                             |                                   |



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| <b>Holman, Michelle</b>   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue: 15</b>          | <b>Title: Herbicides Toxic Effects</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Subject: Forest Practices - Pesticides</b>      |
| <i>Description</i>        | <p>Sir;</p> <p>A long under-played issue regarding the State's forestry management is the state's approval of toxic sprays/herbicide applications. The long -term effects on the general environment cannot be calculated. Daily testing is indicating unpremeditated effects of toxic chemicals on plant, animal, and insect populations key to the health of complex, integrated systems. This is an issue that lurks in the shadows and threatens forest and planetary health in ways of great proportion.</p> <p>Please consider.</p> |                                                    |
| <i>Staff Comments by:</i> | See staff response, General Concern about Pesticides, issue ID 11                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                    |
| Private Forests           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                    |

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| <b>Hoover, Jon</b>        |                                                                                                                                                                                                                                     | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue: 71</b>          | <b>Title: Pesticide Use - Hoover</b>                                                                                                                                                                                                | <b>Subject: Forest Practices - Pesticides</b>      |
| <i>Description</i>        | <p>I need a buffer zone to stop spraying pesticides around my home and schools. I do not want to breathe, taste, or smell pesticides at any time.</p> <p>P.S. I want a natural alternative to eradicating "knotweed" try goats.</p> |                                                    |
| <i>Staff Comments by:</i> | See staff response, General Concern about Pesticides, issue ID # 11                                                                                                                                                                 |                                                    |
| Private Forests           | See staff response, Buffers for Pesticide Application, issue ID # 20                                                                                                                                                                |                                                    |

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| <b>Hoover, Jon</b>        |                                                                                                                                                                                                      | <b>Category: 4a. Outside Board Purview</b> |
| <b>Issue: 72</b>          | <b>Title: BOF Conflict of Interest - Hoover</b>                                                                                                                                                      | <b>Subject: Board of Forestry</b>          |
| <i>Description</i>        | <p>I do not want leaders in Bureau of Forestry to have vested personal financial interest in the conflict of interest of Oregon's citizens. I am one. War is over! If you want it. - John Lennon</p> |                                            |
| <i>Staff Comments by:</i> | Please refer to issue 16                                                                                                                                                                             |                                            |
| Agency Affairs            |                                                                                                                                                                                                      |                                            |



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| <b>Horter,</b>                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 33                             | <b>Title:</b> Credible Research on Pesticides                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>Subject:</b> Forest Practices - Pesticides      |
| <b>Description</b>                           | <p>A public agency should be making decisions based on the best available science. There needs to be a transparent, independent, unbiased search of professional and credible research on forestry herbicides, their modes of transport through the environment, their effect on human health, on fish, and on the environment in general. Good policy is based on good science.</p> <p>For some reason, in the past the Board has been unwilling to acknowledge this, as though they had a Higher Wisdom. Regardless of the Board members individual or collective opinions, public policy should be made based on the best available science.</p> |                                                    |
| <b>Staff Comments by:</b><br>Private Forests | See staff response, Pesticide Literature Review and Use of Best Available Science, issue ID # 22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                    |

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| <b>Huntz, Russell</b>                        |                                                                                                                     | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 109                            | <b>Title:</b> Pesticide Use - Huntz                                                                                 | <b>Subject:</b> Forest Practices - Pesticides      |
| <b>Description</b>                           | I think that a buffer zone should be in place around streams, schools and homes from aerial spraying of herbicides. |                                                    |
| <b>Staff Comments by:</b><br>Private Forests | See staff response, Buffers for Pesticide Application, issue ID # 20                                                |                                                    |

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| <b>Huntz, Russell</b>                       |                                                                       | <b>Category: 4a. Outside Board Purview</b> |
| <b>Issue:</b> 110                           | <b>Title:</b> BOF Conflict of Interest - Huntz                        | <b>Subject:</b> Board of Forestry          |
| <b>Description</b>                          | Should be no financial conflict of interest on the Board of Forestry. |                                            |
| <b>Staff Comments by:</b><br>Agency Affairs | Please refer to issue 16                                              |                                            |

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| <b>Huntz, Russell</b> |                                                                         | <b>Category: 3. General Comments Not Related to Specific Work Plan</b> |
| <b>Issue:</b> 111     | <b>Title:</b> Wood permits - Huntz                                      | <b>Subject:</b> Miscellaneous                                          |
| <b>Description</b>    | More wood permits of fallen trees on roads and wind falls for family's. |                                                                        |



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| <p><i>Staff Comments by:</i><br/>Private Forests</p> | <p>Woodcutting Permits<br/>The Department sells woodcutting permits for designated areas on state forestlands. Other public and private forest landowners offer woodcutting permits as well. The permit process is needed to help ensure that removal of trees for firewood use does not detract from the landowner's management objectives or cause unacceptable fire danger.</p> |
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| <b>Hutts, Carl</b>                           |                                                                                             | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 157                            | <b>Title:</b> Pesticide Use - Hutts                                                         | <b>Subject:</b> Forest Practices - Pesticides      |
| <i>Description</i>                           | We need a buffer zone to stop spraying pesticides near homes, schools, and major waterways. |                                                    |
| <i>Staff Comments by:</i><br>Private Forests | See staff response, Buffers for Pesticide Application, issue ID # 20                        |                                                    |

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| <b>Hutts, Carl</b>                                    |                                                                           | <b>Category: 4a. Outside Board Purview</b> |
| <b>Issue:</b> 158                                     | <b>Title:</b> BOF Conflict of Interest - Hutts                            | <b>Subject:</b> Board of Forestry          |
| <i>Description</i>                                    | Board of Forestry members should not have financial conflict of interest. |                                            |
| <i>Staff Comments by:</i><br>Forest Resource Planning | Please refer to Issue 16.                                                 |                                            |

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| <b>Hutts, Carl</b>                           |                                                                                                        | <b>Category: 3. General Comments Not Related to Specific Work Plan</b> |
| <b>Issue:</b> 159                            | <b>Title:</b> Clearcutting - Hutts                                                                     | <b>Subject:</b> Forest Practices - Clearcutting                        |
| <i>Description</i>                           | Clear cutting our forests is damaging to our ecosystem and destroying the homes of plants and animals. |                                                                        |
| <i>Staff Comments by:</i><br>Private Forests | See staff response, stop clearcutting, Issue #67                                                       |                                                                        |

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| <b>Hutts, Carl</b>        |                                                                                                                                               | <b>Category: 1c. New Topic: Additional Staff Work- Possible Board Action</b> |
| <b>Issue:</b> 160         | <b>Title:</b> Diverse Forests - Hutts                                                                                                         | <b>Subject:</b> Forest Practices - General                                   |
| <i>Description</i>        | Planting genetically altered or modified trees is damaging to our forests.                                                                    |                                                                              |
| <i>Staff Comments by:</i> | Genetically Altered Trees damage Ecosystems<br>Currently, forest managers in Oregon use seedlings grown from (1) seed that is field collected |                                                                              |



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Private Forests or that is collected from tree seed orchards that use traditional breeding practices, or (2) hardwood cuttings (this is most common for hybrid poplar plantations. To the best of staff's knowledge, there is little or no use of seedlings developed using direct genetic manipulation in Oregon forest management at this time.

The standard forest practice Reforestation Rules allow landowners to meet reforestation stocking standards with only native species unless the Department approves a Plan for Alternate Practice. The forest practice regulations do not otherwise address use of trees produced by traditional breeding practices or genetic modification.

Research is being conducted in Oregon on gene modification of poplars and sweetgum tree species. Permits for field planting of genetically modified crops, including trees, are required and are obtained through the Biotechnology Regulatory Service of the USDA Animal Plant and Health Inspection Service (APHIS). The Oregon Department of Agriculture reviews permit applications and provides input to APHIS.

The effects of using genetically altered trees in field forestry should be evaluated as part of a comprehensive, statewide, all-land use native plant and animal conservation strategy. The Board has identified this need in the FPFO (Strategy E), and the Board is considering the issue as it reviews the Private Forestlands Issue Paper, which may lead to inclusion of the issue in the Private Forests Work Plan.

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| <b>Inman, Jerran</b>      |                                                                      | <b>Category:</b> 2. Addressed in Current Work Plan |
| <b>Issue:</b> 83          | <b>Title:</b> Pesticide Use - Inman                                  | <b>Subject:</b> Forest Practices - Pesticides      |
| <i>Description</i>        | We need a buffer zone to stop spraying pesticide near homes.         |                                                    |
| <i>Staff Comments by:</i> | See staff response, Buffers for Pesticide Application, issue ID # 20 |                                                    |
| Private Forests           |                                                                      |                                                    |

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| <b>Inman, Jerran</b>      |                                                             | <b>Category:</b> 4a. Outside Board Purview |
| <b>Issue:</b> 84          | <b>Title:</b> BOF Conflict of Interest - Inman              | <b>Subject:</b> Board of Forestry          |
| <i>Description</i>        | BOF members should not have financial conflict of interest. |                                            |
| <i>Staff Comments by:</i> | Please refer to issue 16                                    |                                            |
| Agency Affairs            |                                                             |                                            |

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| <b>Jacobsen, Edward</b> |                                                                              | <b>Category:</b> 2. Addressed in Current Work Plan |
| <b>Issue:</b> 151       | <b>Title:</b> Pesticide Use - Jacobsen                                       | <b>Subject:</b> Forest Practices - Pesticides      |
| <i>Description</i>      | I would like to have the pesticide spraying stopped near houses and schools. |                                                    |



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| <i>Staff Comments</i><br>by:<br>Private Forests | See staff response, Buffers for Pesticide Application, issue ID # 20 |
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| <b>Jacobsen, Edward</b>                        | <b>Category:</b> 4a. Outside Board Purview                    |                                   |
| <b>Issue:</b> 152                              | <b>Title:</b> BOF Conflict of Interest - Jacobsen             | <b>Subject:</b> Board of Forestry |
| <i>Description</i>                             | BOF members must not have any financial conflict of interest. |                                   |
| <i>Staff Comments</i><br>by:<br>Agency Affairs | Please refer to issue 16                                      |                                   |

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| <b>Jarmer, Chris</b>                           | <b>Category:</b> 1b. New Topic: Incorporate Input Into Existing Work Plan                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                   |
| <b>Issue:</b> 10                               | <b>Title:</b> Eliminate Analysis and Planning - OFIC                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Subject:</b> Board of Forestry |
| <i>Description</i>                             | <p>Members of the Oregon Forest Industries Council (OFIC) own and manage nearly 5,000,000 acres of forestland in Oregon. These companies produce the lion's share of the timber in Oregon and employ the bulk of the people that make up Oregon's second largest sector, the forest products sector.</p> <p>OFIC is unsure why the issue scan was not postponed or outright eliminated in these tough economic times. All non-essential programs should have been eliminated in the last round of budget cuts that balanced the 2007-09 budget with expected general fund revenues. As the battle lines take shape for the 2009-11 budget, even core programs, like the Private Forest Program, are looking at drastic cuts that will essentially eliminate key pieces of the department. Retaining personnel for any planning exercise, such as the issue scan or Forestry Program for Oregon, is unacceptable if any field staff is terminated instead.</p> <p>The Department needs to focus on its fundamental, core functions: protecting forestland from fire and assuring the public that public resources are being protected on private forestland. OFIC urges the Board to discontinue analysis and planning efforts like this immediately.</p> |                                   |
| <i>Staff Comments</i><br>by:<br>Agency Affairs | <p>This submission suggests that the Board discontinue analysis and planning efforts such as the issue scan to focus on primary missions such as fire protection and administering forest protection laws. In its Work Plan 1, the Board has identified the development of policies and programs that promote economically, environmentally and socially sustainable forest management as a high priority. Elements of this work plan include building acceptance and support for sustainable forest management, periodic updates of its priorities and of the Forestry Program for Oregon, and soliciting unfiltered public input through processes such as the issue scan. Periodically revisiting and revising priorities is built into Board and Department work. Given the current economic difficulties, the Board may wish to choose a new approach to this task, and in this process, could consider the substance of this comment.</p>                                                                                                                                                                                                                                                                                                          |                                   |



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| <b>Jebousek, Nyla</b>                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 25                             | <b>Title:</b> Pesticide Literature Review                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Subject:</b> Forest Practices - Pesticides      |
| <b>Description</b>                           | In the fall of 2007 an unprecedented number of citizens sent comments to the Board of Forestry regarding concerns with the widespread use of forestry herbicides and the high likelihood of chemical impacts on human health and the health of our region's ecosystems. Because of the exceptionally large number of responses the ODF staff made a recommendation to the Board that a scientific literature search would be appropriate. The Board then requested the staff to begin the literature search process. Two years have gone by and both the Board and the staff have chosen to not move forward. |                                                    |
| <b>Staff Comments by:</b><br>Private Forests | See staff response, Pesticide Literature Review and Use of Best Available Science, issue ID # 22<br><br>See staff response, Public Health, issue ID # 20                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                    |

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| <b>Johnson, M</b>                            |                                                                                                                      | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 147                            | <b>Title:</b> Pesticide Use - Johnson                                                                                | <b>Subject:</b> Forest Practices - Pesticides      |
| <b>Description</b>                           | We need a buffer zone to stop spraying pesticides near people's homes - we need to Stop aeraial spraying completely. |                                                    |
| <b>Staff Comments by:</b><br>Private Forests | See staff response, Buffers for Pesticide Application, issue ID # 20                                                 |                                                    |

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| <b>Johnson, M</b>                           |                                                                                                                                                                                   | <b>Category: 4a. Outside Board Purview</b> |
| <b>Issue:</b> 148                           | <b>Title:</b> BOF Conflict of Interest - Johnson                                                                                                                                  | <b>Subject:</b> Board of Forestry          |
| <b>Description</b>                          | Board of Forestry members should not have a financial conflict of interest in carying out their board duties. Pay heed to the federal corruption laws - that's what they are for! |                                            |
| <b>Staff Comments by:</b><br>Agency Affairs | please refer to issue 16                                                                                                                                                          |                                            |

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| <b>Johnson, M</b>  |                                      | <b>Category: 3. General Comments Not Related to Specific Work Plan</b> |
| <b>Issue:</b> 149  | <b>Title:</b> Clearcutting - Johnson | <b>Subject:</b> Forest Practices - Clearcutting                        |
| <b>Description</b> | Stop Clear Cutting!                  |                                                                        |



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| <i>Staff Comments</i> | See staff response, stop clearcutting, Issue #67 |
| <i>by:</i>            |                                                  |
| Private Forests       |                                                  |

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| <b>Johnson, M</b>     |                                                                                    | <b>Category:</b> 1b. New Topic: Incorporate Input Into Existing Work Plan |
| <b>Issue:</b> 150     | <b>Title:</b> Diverse Forests - Johnson                                            | <b>Subject:</b> Forest Practices - General                                |
| <i>Description</i>    | Plant a diverse crop - stop monoculture.                                           |                                                                           |
| <i>Staff Comments</i> | See staff response, Diverse forests, native plants; no monocultures, Issue ID # 59 |                                                                           |
| <i>by:</i>            |                                                                                    |                                                                           |
| Private Forests       |                                                                                    |                                                                           |

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| <b>Joos, Sandra</b>   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Category:</b> 2. Addressed in Current Work Plan |
| <b>Issue:</b> 201     | <b>Title:</b> Science Review on Pesticides - Joos                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>Subject:</b> Forest Practices - Pesticides      |
| <i>Description</i>    | Public agencies should make decisions based on the best available science. This does not appear to be happening with regard to the use of herbicides on forest land. I am urging you to conduct a transparent, independent, unbiased search of professional and credible research on forestry herbicides, their modes of transport through the environment, their effect on human health, on fish, and on the environment in general. You cannot make good policy unless you have a foundation of good scientific evidence.<br>Thank you for your attention. |                                                    |
| <i>Staff Comments</i> | See staff response, Pesticide Literature Review and Use of Best Available Science, issue ID # 22                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                    |
| <i>by:</i>            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                    |
| Private Forests       | See staff response, Pesticide Monitoring, issue ID # 23                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                    |

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| <b>Kaczmarek, Jack</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>Category:</b> 2. Addressed in Current Work Plan |
| <b>Issue:</b> 167      | <b>Title:</b> Assess Pesticide Impacts - Kaczmarek                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <b>Subject:</b> Forest Practices - Pesticides      |
| <i>Description</i>     | I write to voice my concern that the BOF has yet to take all the measures reasonably possible to effectively assess the health and environmental impacts of present forestry herbicide use in Oregon forests.<br><br>I am a life long resident of Lincoln County and like many folks in this area worry that these impacts are not being enough looked into on our behalf. Please let us know that your literature search to scientifically establish what is safe use is under way and that our community may be assured that the BOF is not succumbing to timber industry pressure to neglect and minimize our valid concerns.<br><br>Thanks for your time and attention, |                                                    |



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| <i>Staff Comments by:</i> | See staff response, General Concern about Pesticides, issue ID # 11                              |
| Private Forests           | See staff response, Pesticide Literature Review and Use of Best Available Science, issue ID # 22 |
|                           | See staff response, Pesticide Monitoring, issue ID # 23                                          |

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| <b>Karp, Cyndi</b>        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 178         | <b>Title:</b> Pesticides and Civil Rights - Karp                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>Subject:</b> Forest Practices - Pesticides      |
| <i>Description</i>        | <p>I would like to speak to you about the Oregon Government's strategy to reduce the use of toxic chemicals in our good State of Oregon and the Civil Rights involved.</p> <p>I have the Civil Rights as a Citizen of the State of Oregon to have Clean Water to Drink, Clean Air to Breathe and Clean Food to Eat. I have the Civil Right to Chemical Free Water, Air and Food. And, so does every other Citizen of the State of Oregon have the same Civil Rights. When is the State of Oregon Management going to find Solutions to Oregon's problems of Citizen's constant exposure to chemicals everyday. Oregonian's are helping to lead the world and We stand tall for our beliefs. Oregon has been the birthplace of leadership roll in how Oregonian's figure out ways to work together toward Common Goals. No matter how hard the work becomes.</p> <p>My civil rights of clean water, air and food are violated so many times a day I can not count. The protection of all Citizen's of the State of Oregon is mandated by Oregon Constitution. We must implement policies that base decisions on Good Science. There is Good Science out there.</p> <p>See attachment for remaining text.</p> |                                                    |
| <i>Staff Comments by:</i> | See staff response, Pesticide Monitoring, issue ID # 23                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                    |
| Private Forests           | See staff response, Public Health, issue ID # 20                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                    |

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| <b>Kay, Erron</b>         |                                                                                    | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 98          | <b>Title:</b> Pesticide Use - Kay                                                  | <b>Subject:</b> Forest Practices - Pesticides      |
| <i>Description</i>        | We need a buffer zone near & around our homes & schools when spraying pesticides!! |                                                    |
| <i>Staff Comments by:</i> | See staff response, Buffers for Pesticide Application, issue ID # 20               |                                                    |
| Private Forests           |                                                                                    |                                                    |



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| <b>Kay, Erron</b>                           |                                                                                 | <b>Category:</b> 4a. Outside Board Purview |
| <b>Issue:</b> 99                            | <b>Title:</b> BOF Conflict of Interest - Kay                                    | <b>Subject:</b> Board of Forestry          |
| <b>Description</b>                          | BOF (board of forestry) members should not have financial conflict of interest. |                                            |
| <b>Staff Comments by:</b><br>Agency Affairs | Please refer to issue 16                                                        |                                            |

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| <b>Kay, Erron</b>                            |                                                                                    | <b>Category:</b> 1b. New Topic: Incorporate Input Into Existing Work Plan |
| <b>Issue:</b> 100                            | <b>Title:</b> Diverse Forests - Kay                                                | <b>Subject:</b> Forest Practices - General                                |
| <b>Description</b>                           | Replant with a diverse native crop, rather than the mono crops going on now.       |                                                                           |
| <b>Staff Comments by:</b><br>Private Forests | See staff response, Diverse forests, native plants; no monocultures, Issue ID # 59 |                                                                           |

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| <b>Keller, Katherine</b>                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>Category:</b> 2. Addressed in Current Work Plan |
| <b>Issue:</b> 34                             | <b>Title:</b> Ban Herbicide Use                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>Subject:</b> Forest Practices - Pesticides      |
| <b>Description</b>                           | I would like to propose a ban on the use of herbicides within the Oregon State Forest. It is known that herbicides have a detrimental effect on amphibians, insects, and mammals. We cannot take the chance of impacting the frog populations and bee populations, which are already under such environmental stresses. It is also a known fact that herbicides drift with the wind, which can have a very large impact on those of us that have gardens, and gardens which we try to maintain under sustainable conditions. I urge you to use other options at your disposal, rather than chemicals. |                                                    |
| <b>Staff Comments by:</b><br>Private Forests | See staff response, General Concern about Pesticides, issue ID # 11                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                    |

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| <b>Kent, Melissa</b>                         |                                                                                               | <b>Category:</b> 2. Addressed in Current Work Plan |
| <b>Issue:</b> 91                             | <b>Title:</b> Pesticide Use - Kent                                                            | <b>Subject:</b> Forest Practices - Pesticides      |
| <b>Description</b>                           | We need a buffer zone to stop spraying pesticides near homes, schools, and surface waterways. |                                                    |
| <b>Staff Comments by:</b><br>Private Forests | See staff response, Buffers for Pesticide Application, issue ID # 20                          |                                                    |



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| <b>Kent, Melissa</b>      |                                                               | <b>Category:</b> 4a. Outside Board Purview |
| <b>Issue:</b> 92          | <b>Title:</b> BOF Conflict of Interest - Kent                 | <b>Subject:</b> Board of Forestry          |
| <b>Description</b>        | BOF members should not have a financial conflict of interest. |                                            |
| <b>Staff Comments by:</b> | Please refer to issue 16                                      |                                            |
| Agency Affairs            |                                                               |                                            |

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| <b>Kent, Melissa</b>      |                                                                                    | <b>Category:</b> 1b. New Topic: Incorporate Input Into Existing Work Plan |
| <b>Issue:</b> 93          | <b>Title:</b> Diverse Forests - Kent                                               | <b>Subject:</b> Forest Practices - General                                |
| <b>Description</b>        | Put an end to monocrops. Plant a diverse native forest.                            |                                                                           |
| <b>Staff Comments by:</b> | See staff response, Diverse forests, native plants; no monocultures, Issue ID # 59 |                                                                           |
| Private Forests           |                                                                                    |                                                                           |

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| <b>Kent, Melissa</b>      |                                                                          | <b>Category:</b> 3. General Comments Not Related to Specific Work Plan |
| <b>Issue:</b> 94          | <b>Title:</b> Clearcutting - Kent                                        | <b>Subject:</b> Forest Practices - Clearcutting                        |
| <b>Description</b>        | Stop clearcutting. Develop and implement sustainable forestry practices. |                                                                        |
| <b>Staff Comments by:</b> | See staff response, stop clearcutting, Issue #67                         |                                                                        |
| Private Forests           |                                                                          |                                                                        |

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| <b>Koch, Randall</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>Category:</b> 2. Addressed in Current Work Plan |
| <b>Issue:</b> 31     | <b>Title:</b> Pesticides Literature Review                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>Subject:</b> Forest Practices - Pesticides      |
| <b>Description</b>   | <p>In 2007 there was a significant response to the use of herbicides in state forest activities being planned. In response, the ODF staff made a recommendation to the Board that a scientific literature search would be appropriate. The Board then requested the staff to begin the literature search process. Two years have gone by and both the Board and the staff have chosen to not move forward. The literature search is still the most appropriate means available to have the science regarding what are the most appropriate methods to be used and directed by policy to be planned for. Ignoring this call and not providing this indicate that other forces are influencing decisions and that will have to be reconciled when accountability is in question for actions taken. It is the responsibility of the Board of Forestry to do due diligence on its proposals, providing required scientific analysis and sighting studies that support their policy. Without that work being done the Board is susceptible to subjective influence and political direction. The public asks that the decisions be accountable and supportable based on research and transparency of process. I encourage you to follow through on the literature search you</p> |                                                    |



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|                                                 | indicated was going to happen before you create any further policy regarding herbicide use.      |
| <i>Staff Comments</i><br>by:<br>Private Forests | See staff response, Pesticide Literature Review and Use of Best Available Science, issue ID # 22 |

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| <b>Kokerstein, Dori</b>                         |                                                                      | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue: 78</b>                                | <b>Title: Pesticide Use - Kokerstein</b>                             | <b>Subject: Forest Practices - Pesticides</b>      |
| <i>Description</i>                              | Form a buffer zone to protect homes from spraying of pesticides.     |                                                    |
| <i>Staff Comments</i><br>by:<br>Private Forests | See staff response, Buffers for Pesticide Application, issue ID # 20 |                                                    |

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| <b>Kokerstein, Dori</b>                        |                                                                                                                 | <b>Category: 4a. Outside Board Purview</b> |
| <b>Issue: 79</b>                               | <b>Title: BOF Conflict of Interest - Kokerstein</b>                                                             | <b>Subject: Board of Forestry</b>          |
| <i>Description</i>                             | Board members of the Oregon Dept. of Agriculture should not have any financial interest in the forest industry. |                                            |
| <i>Staff Comments</i><br>by:<br>Agency Affairs | The comment presumably refers to the Board of Forestry. Please refer to issue 16                                |                                            |

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| <b>Kokerstein, Dori</b>                         |                                                                                    | <b>Category: 1b. New Topic: Incorporate Input Into Existing Work Plan</b> |
| <b>Issue: 80</b>                                | <b>Title: Diverse Forests - Kokerstein</b>                                         | <b>Subject: Forest Practices - General</b>                                |
| <i>Description</i>                              | Please plant native plants.                                                        |                                                                           |
| <i>Staff Comments</i><br>by:<br>Private Forests | See staff response, Diverse forests, native plants; no monocultures, Issue ID # 59 |                                                                           |

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| <b>Kubert, Bruce</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue: 171</b>    | <b>Title: Human Health Effects - Kubert</b>                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Subject: Forest Practices - Pesticides</b>      |
| <i>Description</i>   | I am concerned with the widespread use of forestry herbicides and the high likelihood of chemical impacts on human health and the health of our region's ecosystems. A public agency should be making decisions based on the best available science. I am also concerned that it seems apparent that the timber industry has the power to influence the Board of Forestry and the ODF staff. There needs to be a transparent, independent, unbiased search of professional |                                                    |



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and credible research on forestry herbicides, their modes of transport through the environment, their effect on human health, on fish, and on the environment in general. Good policy is based on good science not on the economic interest of a narrow segment of our population and the even narrower interests of the very powerful timber industry. In my life as an Organic Farmer, struggling to make a living in rural Oregon, I have personally been effected by forestry spraying and it's negative impact on my economic viability. Thank you, Bruce kubert

*Staff Comments by:*

See staff response, General Concern about Pesticides, issue ID # 11

Private Forests

See staff response, Buffers for Pesticide Application, issue ID # 20

See staff response, Pesticide Literature Review and Use of Best Available Science, issue ID # 22

See staff response, Pesticide Monitoring, issue ID # 23

See staff response, Public Health, issue ID # 20

**Leadership Team, ODF**

**Category: 2. Addressed in Current Work Plan**

**Issue:** 215

**Title:** Inform Oregonians of BOF policies, forest value

**Subject:** Education

*Description*

Keeping Oregonians informed of BOF policies, forest values, importance of forests and forestry, particularly in a time of changing state demographics (which will likely continue to accelerate as people seek haven from tougher economic and living conditions.

*Staff Comments by:*  
Agency Affairs

The importance of informing Oregonians about forest values, the importance of forests, and, more specifically, Board policies, has long been recognized, and is addressed in at least two work plans - No. 4, on urban outreach, and No. 1, on implementation of policies and programs to promote sustainable forestry.

Work Plan No. 4 sought to address connecting with urban Oregonians through providing service as well as through communication and outreach. Activities completed under this plan include development of overarching key messages to guide a range of communications. Other aspects of the plan have not moved forward for various reasons, including difficulty developing and funding a service model that would connect the department with urban and suburban Oregonians.

Work Plan 1 directly addresses this topic in several ways. These include revision of the Forestry Program for Oregon - a major expression of Board mission and goals - and invited public participation and opportunities for news coverage of a forest assessment symposium, a roundtable on indicators of sustainability, and updating of the FPFO.

Issues raised in this comment also are addressed in various ways at the staff level. These include an ongoing program of media relations and public contacts, Web and publication use, and a work group investigating ways to strengthen and coordinate the agency's education and outreach activities and better fit them with the work of many partners.

Nevertheless, gaining Oregonians' attention on forestry issues remains challenging. Reasons



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include the multitude of diverse messages people receive daily, a need to repeat basic messages as new Oregonians arrive, and the resources necessary to use television, a highly effective medium.

Economic difficulty further works against this, as during such times, public concern about the economy outweighs concern about natural resources issues. Polling indicates this is occurring now.

| <b>Leadership Team, ODF</b>                 |                                                                                                                                                                                                                                                                                                                                                                                                                         | <b>Category: 3. General Comments Not Related to Specific Work Plan</b> |
|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|
| <b>Issue:</b> 216                           | <b>Title:</b> Maintain relevance of forestry to Oregon                                                                                                                                                                                                                                                                                                                                                                  | <b>Subject:</b> Education                                              |
| <b>Description</b>                          | Maintaining the relevance of forestry in Oregon and to Oregonians in a time of declining rural communities, major forest health issues, products and production challenges/trends.                                                                                                                                                                                                                                      |                                                                        |
| <b>Staff Comments by:</b><br>Agency Affairs | This comment could fall under elements of Work Plans 1 (Strategic Planning, Implementation and Monitoring) and 4 (Urban Outreach). But it is also a general statement about the importance of keeping our work relevant in an increasingly urbanizing state. This potentially could involve different service models to serve urban or suburban populations, as well as enhanced communication, education and outreach. |                                                                        |
|                                             | Please see issue 215 for further analysis.                                                                                                                                                                                                                                                                                                                                                                              |                                                                        |

| <b>Leadership Team, ODF</b>                           |                                                                                                                                  | <b>Category: 2. Addressed in Current Work Plan</b> |
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| <b>Issue:</b> 217                                     | <b>Title:</b> Improve federal forest management                                                                                  | <b>Subject:</b> Federal Lands                      |
| <b>Description</b>                                    | Improving federal forest land management and the associated values and benefits to Oregon, Oregon's communities, and Oregonians. |                                                    |
| <b>Staff Comments by:</b><br>Forest Resource Planning | See staff responses for Issue Scan ID #s 5, 6, 43, 1nd 162                                                                       |                                                    |

| <b>Leadership Team, ODF</b>                           |                                                                                                                                                                                                                                 | <b>Category: 2. Addressed in Current Work Plan</b> |
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| <b>Issue:</b> 218                                     | <b>Title:</b> Narrow, articulate Board priorities                                                                                                                                                                               | <b>Subject:</b> Board of Forestry                  |
| <b>Description</b>                                    | Narrowing down and articulating the priorities of the Board's own work. Tier down from FPFO update and provide a clear two-year focus (using the Decision Support System and the new strategic planning framework for support). |                                                    |
| <b>Staff Comments by:</b><br>Forest Resource Planning | This comment is addressed through the Board's Strategic Planning, Implementation, and Monitoring Work Plan.                                                                                                                     |                                                    |



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| <b>Light, Jeff</b>                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 204                            | <b>Title:</b> Public Assurance on Forest Practices Act - Plum Creek                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <b>Subject:</b> Forest Practices - General         |
| <b>Description</b>                           | <p>I am writing on behalf of Plum Creek Timber Company to provide brief input on what we believe are the most important forest-related issues in Oregon today, and what the Board's priorities should be. Our thoughts on this are guided by the current economic conditions and the extremely difficult times that face the forest products industry.</p> <p>There are two areas we believe deserve the full attention of the Board of Forestry. First, the public needs reassurance that the Forest Practices Act is being implemented and public resources are being protected on private forestland.</p> |                                                    |
| <b>Staff Comments by:</b><br>Private Forests | <p>Funding for the Private Forests Division; Reassure the Public</p> <p>The Board recognizes the need for stable, adequate funding for the Private Forests Division so that staff can assist landowners in sustainable forest management and to reassure the public that resources are being protected. The primary board issue in Work Plan 6 Private Forests addresses this issue, as does the Private Forestlands Issue Paper currently under review by the Board. However, the issue is not yet directly addressed in an IBI.</p>                                                                        |                                                    |

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| <b>Light, Jeff</b>                                |                                                                                                                                                                                                                                                                                                                                                                                              | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 206                                 | <b>Title:</b> Adequate Fire Funding - Plum Creek                                                                                                                                                                                                                                                                                                                                             | <b>Subject:</b> Fire - Funding                     |
| <b>Description</b>                                | <p>There needs to be adequate funding and the infrastructure to protect Oregon's forests from devastation by wildfire.</p> <p>When the economy improves, there will be time to revisit the Forestry Program for Oregon and update the associated work plans and indicators. Plum Creek will gladly participate more fully at that time.</p> <p>Thank you for the opportunity to comment.</p> |                                                    |
| <b>Staff Comments by:</b><br>Protection from Fire | <p>In the Forestry Program for Oregon, Strategy "F", the Board promotes the funding for the Protection From Fire Program to maintain the most efficient level.</p> <p>With regard to the Board of Forestry strategic planning, see staff response to Issue Scan ID# 10</p>                                                                                                                   |                                                    |

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| <b>Lodwig, Ethan</b> |                                                                                                                                                                                                                                                                                                                                                                            | <b>Category: 1b. New Topic: Incorporate Input Into Existing Work Plan</b> |
| <b>Issue:</b> 14     | <b>Title:</b> Motorcycle Trails                                                                                                                                                                                                                                                                                                                                            | <b>Subject:</b> State Forests - Recreation                                |
| <b>Description</b>   | <p>I know that you have many important issues to deal with, but one that often gets overlooked is recreation. Oregon has an amazing reservoir of land that could be used for recreation. According to the USDA, approximately 23% of the US population, over the age of 16 recreates on OHVs. We need more singletrack motorcycle trails in Oregon. Loop, interlinking</p> |                                                                           |



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singletrack trails not only provides a high quality recreational experience, it also generates a large amount of resources. Direct OHV sales accounts for approximately \$16.4 billion dollars per year in the US. Through OHV grants, there is money available to help build and maintain trail systems. OHV clubs provide many hours of volunteer work on multiple use trails that be enjoyed by everyone.

Please support off-highway motorcycle riding by developing more trails.

Thank you for this opportunity to comment.

*Staff Comments*  
by:  
State Forests

This issue is within the scope of Work Plan 2, IBI 08 regarding recreation. State Forests currently provide OHV trails, and the State Forests Division staff work closely with members of the OHV community to maintain these trail systems. Future development of an expanded trail system will occur appropriate to the strategic direction established for the recreation program. Work Plan 2, IBI 08 addresses the need to revisit the strategic vision and strategies for recreation. This revisited strategic vision would address the role and level of contribution regarding recreation that would be provided by State Forests. Any actions resulting from the new strategic direction would be implemented according to available resources. Given that the recreation program's foundational funding is a portion of timber harvest revenues, these funds have been dramatically reduced during the current economic downturn. Outside funding sources (e.g., grants) have also become more limited.

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| <b>Luciano, Varie</b>        |                                                                      | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 73             | <b>Title:</b> Pesticide Use - Luciano                                | <b>Subject:</b> Forest Practices - Pesticides      |
| <b>Description</b>           | We need a buffer zone to stop spraying pesticide near homes.         |                                                    |
| <b>Staff Comments</b><br>by: | See staff response, Buffers for Pesticide Application, issue ID # 20 |                                                    |
| Private Forests              |                                                                      |                                                    |

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| <b>Luciano, Varie</b>        |                                                             | <b>Category: 4a. Outside Board Purview</b> |
| <b>Issue:</b> 74             | <b>Title:</b> BOF Conflict of Interest - Luciano            | <b>Subject:</b> Board of Forestry          |
| <b>Description</b>           | BOF members should not have financial conflict of interest. |                                            |
| <b>Staff Comments</b><br>by: | Please refer to issue 16                                    |                                            |
| Agency Affairs               |                                                             |                                            |

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| <b>Luciano, Varie</b> |                                         | <b>Category: 1b. New Topic: Incorporate Input Into Existing Work Plan</b> |
| <b>Issue:</b> 75      | <b>Title:</b> Diverse Forests - Luciano | <b>Subject:</b> Forest Practices - General                                |
| <b>Description</b>    | Plant a diverse native crop.            |                                                                           |



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*Staff Comments* See staff response, Diverse forests, native plants; no monocultures, Issue ID # 59  
*by:*  
 Private Forests

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| <b>Luciano, Varie</b>                                  |                                                           | <b>Category: 3. General Comments Not Related to Specific Work Plan</b> |
| <b>Issue:</b> 214                                      | <b>Title:</b> Clearcutting - Luciano                      | <b>Subject:</b> Forest Practices - Clearcutting                        |
| <i>Description</i>                                     | Stop clear cutting.                                       |                                                                        |
| <i>Staff Comments</i><br><i>by:</i><br>Private Forests | See staff response, stop clearcutting, Issue Scan ID # 67 |                                                                        |

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|------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|
| <b>Lukas, Pamela</b>                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <b>Category: 3. General Comments Not Related to Specific Work Plan</b> |
| <b>Issue:</b> 13                                     | <b>Title:</b> OHV Use                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Subject:</b> State Forests - Recreation                             |
| <i>Description</i>                                   | <p>I firmly believe that proper management of our forests is crucial for all of Oregon.</p> <p>Consider this: over 38% of the population off roads; OHV use makes up a vast majority of all recreational users. They provide a large boon to local economy as well as pay additional fees (that most other users do not have to pay) providing revenue for the upkeep of the recreation areas.</p> <p>The wider 4x4 and quad trails provide firebreaks, increasing the security to the area and surrounding communities. Keeping OHV users in these areas ensures the money and the volunteer manpower to properly upkeep the trails which provide these essential firebreaks. Along any narrow trail, whether OHV or not, the underbrush and low branches should be removed along with weak, sick, and crowded trees. Of course, if a trail goes through a stream, a fish friendly bridge should be built. And if a trail becomes as muddy as to cause erosion fears, it should be adequately graveled. Signs stating difficulty, length and recommended usage (dirt bike, quad, 4x4, horse, mountain bike, and/or hike, etc) are completely appropriate, as are one way and stop signs. Since OHV organizations make up the vast majority of users they are the ones who provide meaningful volunteer hours to keep their trails maintained.</p> <p>However, ALL users should be involved in the upkeep of their trails!</p> <p>All visitors benefit the local economy of surrounding communities; OHV users are the largest portion of users. Outdoor recreation provides a place to relax and bond with family and friends. All users need to work together to manage the recreational area.</p> |                                                                        |
| <i>Staff Comments</i><br><i>by:</i><br>State Forests | <p>This commenter does not provide a specific request relative to their submitted issue. However, the State Forests Division can speak to many of the points raised. The Division includes in its suite of recreational opportunities trails specifically for OHV users. The Division works closely with the OHV community to develop effective partnerships that are key to the Division's ability to do trail maintenance projects. The Division recreation staff are continuing to refine and improve its trail maintenance protocols, again in cooperation with our OHV partners. The management of these trails and the number of recreation management staff to</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                        |



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manage the recreation function are maintained at a level commensurate with the resources available to the Division. Currently, funding for recreation development and maintenance is secured through a number of sources (e.g., grants, volunteer labor, donations), with the foundational funds derived from a portion of timber harvesting revenues.

| <b>Lynch, Mark</b>           | <b>Category: 2. Addressed in Current Work Plan</b>                                                                                      |                                               |
|------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|
| <b>Issue:</b> 87             | <b>Title:</b> Pesticide Use - Lynch                                                                                                     | <b>Subject:</b> Forest Practices - Pesticides |
| <i>Description</i>           | We need a buffer zone between homes that is not sprayed with herbicides pesticides or other poisons so people are not poisoned anymore. |                                               |
| <i>Staff Comments</i><br>by: | See staff response, Buffers for Pesticide Application, issue ID # 20                                                                    |                                               |
| Private Forests              |                                                                                                                                         |                                               |

| <b>Lynch, Mark</b>           | <b>Category: 4a. Outside Board Purview</b>                                                                                          |                                   |
|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|
| <b>Issue:</b> 88             | <b>Title:</b> BOF Conflict of Interest - Lynch                                                                                      | <b>Subject:</b> Board of Forestry |
| <i>Description</i>           | BOF members should not have financial conflict of interest no CEO's or executives of timber companies should sit on forestry board. |                                   |
| <i>Staff Comments</i><br>by: | Please refer to issue 16                                                                                                            |                                   |
| Agency Affairs               |                                                                                                                                     |                                   |

| <b>Lynch, Mark</b>           | <b>Category: 1b. New Topic: Incorporate Input Into Existing Work Plan</b>          |                                            |
|------------------------------|------------------------------------------------------------------------------------|--------------------------------------------|
| <b>Issue:</b> 89             | <b>Title:</b> Diverse Forests - Lynch                                              | <b>Subject:</b> Forest Practices - General |
| <i>Description</i>           | More diverse tree growing instead of monocrops.                                    |                                            |
| <i>Staff Comments</i><br>by: | See staff response, Diverse forests, native plants; no monocultures, Issue ID # 59 |                                            |
| Private Forests              |                                                                                    |                                            |

| <b>Lynch, Mark</b>           | <b>Category: 3. General Comments Not Related to Specific Work Plan</b> |                                                 |
|------------------------------|------------------------------------------------------------------------|-------------------------------------------------|
| <b>Issue:</b> 90             | <b>Title:</b> Clearcutting - Lynch                                     | <b>Subject:</b> Forest Practices - Clearcutting |
| <i>Description</i>           | Selective cut sustainable harvest that protects fish, and wildlife.    |                                                 |
| <i>Staff Comments</i><br>by: | See staff response, stop clearcutting, Issue #67                       |                                                 |
| Private Forests              |                                                                        |                                                 |



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|-------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|
| <b>MacWilliam, R.</b>                                 |                                                                                                                                                                                                                                                                                                                                                                                              | <b>Category: 2. Addressed in Current Work Plan</b>                     |
| <b>Issue:</b> 186                                     | <b>Title:</b> Various Suggestions                                                                                                                                                                                                                                                                                                                                                            | <b>Subject:</b> Miscellaneous                                          |
| <i>Description</i>                                    | Sometimes I see more experts than boots on the ground on federal and state-local levels. It's a problem of how to hire - how to pay? If we have youth do it, they must be insured and taught safety habits. It seems our climate may be getting hotter and drier?                                                                                                                            |                                                                        |
|                                                       | See PDF for remaining text.                                                                                                                                                                                                                                                                                                                                                                  |                                                                        |
| <i>Staff Comments by:</i><br>Forest Resource Planning | The commenter addressed fuels build-ups, particularly overstocked white fire and increased fire danger. Enhanced marketing opportunities for this material through innovative products are encouraged. These comments are relevant to the Board's existing Forest Vitality Work Plan and its Intermediate Board Issues involving forest cluster economic development and forest restoration. |                                                                        |
| <b>Martin, Sita</b>                                   |                                                                                                                                                                                                                                                                                                                                                                                              | <b>Category: 2. Addressed in Current Work Plan</b>                     |
| <b>Issue:</b> 139                                     | <b>Title:</b> Pesticide Use - Martin, Sita                                                                                                                                                                                                                                                                                                                                                   | <b>Subject:</b> Forest Practices - Pesticides                          |
| <i>Description</i>                                    | Please create a buffer zone to STOP spraying pesticides near homes.                                                                                                                                                                                                                                                                                                                          |                                                                        |
| <i>Staff Comments by:</i><br>Private Forests          | See staff response, Buffers for Pesticide Application, issue ID # 20                                                                                                                                                                                                                                                                                                                         |                                                                        |
| <b>Martin, Sita</b>                                   |                                                                                                                                                                                                                                                                                                                                                                                              | <b>Category: 4a. Outside Board Purview</b>                             |
| <b>Issue:</b> 140                                     | <b>Title:</b> BOF Conflict of Interest - Martin, Sita                                                                                                                                                                                                                                                                                                                                        | <b>Subject:</b> Board of Forestry                                      |
| <i>Description</i>                                    | Board of Forestry members should not have financial conflict of interest.                                                                                                                                                                                                                                                                                                                    |                                                                        |
| <i>Staff Comments by:</i><br>Agency Affairs           | Please refer to issue 16                                                                                                                                                                                                                                                                                                                                                                     |                                                                        |
| <b>Martin, Sita</b>                                   |                                                                                                                                                                                                                                                                                                                                                                                              | <b>Category: 3. General Comments Not Related to Specific Work Plan</b> |
| <b>Issue:</b> 141                                     | <b>Title:</b> Clearcutting - Martin, Sita                                                                                                                                                                                                                                                                                                                                                    | <b>Subject:</b> Forest Practices - Clearcutting                        |
| <i>Description</i>                                    | Please STOP clearcutting!                                                                                                                                                                                                                                                                                                                                                                    |                                                                        |
| <i>Staff Comments by:</i><br>Private Forests          | See staff response, stop clearcutting, Issue #67                                                                                                                                                                                                                                                                                                                                             |                                                                        |



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|----------------------------------------------|------------------------------------------------------------------------------------|---------------------------------------------------------------------------|
| <b>Martin, Sita</b>                          |                                                                                    | <b>Category:</b> 1b. New Topic: Incorporate Input Into Existing Work Plan |
| <b>Issue:</b> 142                            | <b>Title:</b> Diverse Forests - Martin, Sita                                       | <b>Subject:</b> Forest Practices - General                                |
| <b>Description</b>                           | Please plant diverse native trees.                                                 |                                                                           |
| <b>Staff Comments by:</b><br>Private Forests | See staff response, Diverse forests, native plants; no monocultures, Issue ID # 59 |                                                                           |

|                                             |                                                                 |                                            |
|---------------------------------------------|-----------------------------------------------------------------|--------------------------------------------|
| <b>McDowall, Eba</b>                        |                                                                 | <b>Category:</b> 4a. Outside Board Purview |
| <b>Issue:</b> 85                            | <b>Title:</b> BOF Conflict of Interest - McDowall               | <b>Subject:</b> Board of Forestry          |
| <b>Description</b>                          | BOF members should not have any financial conflict of interest! |                                            |
| <b>Staff Comments by:</b><br>Agency Affairs | Please refer to issue 16                                        |                                            |

|                                              |                                                                                          |                                                    |
|----------------------------------------------|------------------------------------------------------------------------------------------|----------------------------------------------------|
| <b>McDowall, Eba</b>                         |                                                                                          | <b>Category:</b> 2. Addressed in Current Work Plan |
| <b>Issue:</b> 86                             | <b>Title:</b> Pesticide Use - McDowall                                                   | <b>Subject:</b> Forest Practices - Pesticides      |
| <b>Description</b>                           | We need a buffer zone to stop spraying pesticides near homes, schools, water, and crops. |                                                    |
| <b>Staff Comments by:</b><br>Private Forests | See staff response, Buffers for Pesticide Application, issue ID # 20                     |                                                    |

|                                              |                                                                                                                             |                                                    |
|----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| <b>McLeod, Brenna</b>                        |                                                                                                                             | <b>Category:</b> 2. Addressed in Current Work Plan |
| <b>Issue:</b> 53                             | <b>Title:</b> Pesticide Use - McLeod                                                                                        | <b>Subject:</b> Forest Practices - Pesticides      |
| <b>Description</b>                           | Spraying kills the natural habitat so I would be good to stop it. Make a buffer zone to stop spraying near homes & schools. |                                                    |
| <b>Staff Comments by:</b><br>Private Forests | See staff response, Buffers for Pesticide Application, issue ID # 20                                                        |                                                    |

|                     |                                                                                  |                                                    |
|---------------------|----------------------------------------------------------------------------------|----------------------------------------------------|
| <b>McNutt, Mark</b> |                                                                                  | <b>Category:</b> 2. Addressed in Current Work Plan |
| <b>Issue:</b> 54    | <b>Title:</b> Pesticide Use - McNutt                                             | <b>Subject:</b> Forest Practices - Pesticides      |
| <b>Description</b>  | Dear ODF Board - I am concerned as a long time tree farm owner with [unreadable] |                                                    |



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background in reforestation about herbicide and pesticide spraying and monitoring the effects of same.

This practice has compromised our forests and streams and is not well monitored as there are implied conflict of intrests in board of Forestry members. This practice should also be addressed. Third, I am in favor of diverse reforetation which goes beyond the need to spray & [unreadable] to enhance Douglas Fir monocrop farming.

This is my point of view, based on decades of timberland management experience.

*Staff Comments* See staff response, General Concern about Pesticides, issue ID # 11

by:

Private Forests See staff response, Pesticide Monitoring, issue ID # 23

**Meutzer, Fred**

**Category: 2. Addressed in Current Work Plan**

**Issue:** 123      **Title:** Pesticide Use - Meutzer      **Subject:** Forest Practices - Pesticides

*Description* Buffer Zone - I think there should be at least a 300 yard buffer zone around human dwellings when aerial spraying herbicides on timber land.

*Staff Comments* See staff response, Buffers for Pesticide Application, issue ID # 20

by:

Private Forests

**Meutzer, Fred**

**Category: 4a. Outside Board Purview**

**Issue:** 124      **Title:** BOF Conflict of Interest - Meutzer      **Subject:** Board of Forestry

*Description* There should be no financial conflict of interest allowed on the board of forestry.

*Staff Comments* Please refer to issue 16

by:

Agency Affairs

**Monteverde, Gustavo**

**Category: 2. Addressed in Current Work Plan**

**Issue:** 166      **Title:** Slash Retention      **Subject:** Forest Practices - General

*Description* Review current requirements of organic material retention at logging sites, in the face of recent increases of "logging by products" removal for utilization in biomass generation facilities. Retention of organic material plays a key role in nutrient cycling and site regeneration.

*Staff Comments* Slash Retention

by:

Private Forests Senate Bill 1072 (2005) directed the State Forester to prepare a report every three years that evaluates the effect of woody biomass collection and conversion on the plant and wildlife resources and on the air and water quality of this state. In December 2008, the Department completed the first report. The conclusions of the report were that current natural resource



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regulations adequately protect soil, air, water, and fish and wildlife resources, but that continuing evaluation is needed. Updated reports will be due in 2011, 2014, and so on. This issue and the biomass report are addressed in Work Plan 3, Forest Vitality.

**Monteverde, Gustavo**

**Category: 3. General Comments Not Related to Specific Work Plan**

**Issue:** 169      **Title:** Ephemeral & Non-Fish Streams      **Subject:** Forest Practices - Riparian Management

**Description**      The Oregon Forest Practices Rules (FPR) lack protection for ephemeral and non-fish bearing streams. Current rules require no retention of any trees to protect these important aquatic systems. Buffering these systems with riparian forest protection is vital to protect water quality and food production for all aquatic biota.

**Staff Comments by:**  
 Private Forests      See Issue #7 Stream Buffers

**Monteverde, Gustavo**

**Category: 2. Addressed in Current Work Plan**

**Issue:** 173      **Title:** Increased Salmon Protection      **Subject:** Forest Practices - Riparian Management

**Description**      Ensuring that state FPR and Forest Management Practice (FMP) are consistent w/recovery of salmon (not simply “no jeopardy”). For example: FPR still allow culverts to be built to 1/2 bank full width, which often clog/fail; FPR allows logging practices inconsistent with aquatic health and the retention/expansion --where appropriate-- of Salmon Anchor Habitats.

**Staff Comments by:**  
 Private Forests      Increased Salmon Protection  
 The forest practice rules are designed to protect water quality and to retain riparian trees and other vegetation as needed to provide the functions and values needed to provide aquatic habitat components such as shade, large wood, and nutrients. The rules also contain incentives for landowners to place large wood in fish use streams. The Water Protection Rules were revised in 1994 to require vegetation retention along more streams used by fish, to increase riparian vegetation retention standards, and to require more effective fish passage at forest road crossings on fish use streams. In 2006, the Board revised to rules to extend riparian protection upstream of artificial obstructions to fish use, and to require retention of wildlife leave trees along certain debris-torrent prone streams so that the trees might be entrained in landslides and be transported to fish use streams. These latest revisions were the result of a review of the forest practices rules for effectiveness in supporting salmon populations and water quality begun in 1999 with the Forest Practices Advisory Committee (FPAC) process. The process also resulted in a number of voluntary measures landowners can undertake to improve conditions for salmon under the Oregon Plan for Salmon and Watersheds. The Board recently completed the review process (Work Plan 6, IBI 3, Topic 1 Closure on Outstanding FPAC Recommendations).



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| <b>Monteverde, Gustavo</b>                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <b>Category: 2. Addressed in Current Work Plan</b>     |
|----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|
| <b>Issue:</b> 175                            | <b>Title:</b> Large Wood                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>Subject:</b> Forest Practices - Riparian Management |
| <i>Description</i>                           | <p>A. The primary limiting factor for fish recovery is stream complexity which is driven in great part by large wood. For this purpose, ODF needs to do a better job leaving trees in large wood delivery areas within state forest lands. It also needs to leave the existing in stream large wood undisturbed, and discourage or prohibit its removal by others.</p> <p>B. Work with private landowners to encourage/educate on identifying/managing private land large wood delivery areas. Partnerships with private landowners will provide a more consistent basin-scale management approach to addressing limiting factors.</p>                                                                                                                                                                                                                                                                                                                                                               |                                                        |
| <i>Staff Comments by:</i><br>Private Forests | <p><b>Collaborative Processes to Retain Large Wood for Streams</b><br/>           The Board is addressing this issue. The forest practice Water Protection Rules require retention of trees along fish use streams as a source of future large wood for the streams. The rules also prohibit removal of large wood from streams and promote placement of large wood for fish habitat improvement. The Board and Department have worked with private forestland owners to develop voluntary measures under the Oregon Plan for Salmon and Watersheds. The measures include placement of large wood in streams for improvements in fish habitat as well as retention of more trees along fish use streams. The Department will assist landowners in determining where it is most beneficial to retain trees or place large wood (known as the High Aquatic Potential or "HAP" concept).</p> <p>This issue is addressed in Work Plan 6, IBI 3, Topic 1 Closure on Outstanding FPAC Recommendations.</p> |                                                        |

| <b>Monteverde, Gustavo</b>                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <b>Category: 4b. Non-Board Issue for Staff to Address</b> |
|----------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------|
| <b>Issue:</b> 176                            | <b>Title:</b> Roads and Water Quality                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Subject:</b> Forest Practices - General                |
| <i>Description</i>                           | <p>The fact that we have too many roads in our forests and the lack of road maintenance of them, constitute an ongoing threat to freshwater quality protection.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                           |
| <i>Staff Comments by:</i><br>Private Forests | <p><b>Forest Roads damage Water Quality</b><br/>           The Forest Practices Act and forest practice rules require practices that protect water quality during road construction and use. Research and monitoring has shown that water quality is adequately protected if road management practices are in compliance with state forest practice regulations.</p> <p>The issue is related to Private Forests Work Plan IBI 3, but is not specifically mentioned as a topic.</p> <p>The Board has endorsed an Oregon Indicator of Sustainable Forest Management to systematically evaluate forest road risks to soil and water resources and the department is seeking funding for implementation.</p> |                                                           |



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| <b>Monteverde, Gustavo</b>                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>Category: 1b. New Topic: Incorporate Input Into Existing Work Plan</b> |
|--------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|
| <b>Issue:</b> 191                          | <b>Title:</b> GPV Definition - Freshwater Trust                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>Subject:</b> State Forests - General                                   |
| <i>Description</i>                         | <p>The Freshwater Trust (formerly Oregon Trust and Oregon Water Trust-recently merged) is pleased to respond to your invitation for submissions in the Board of Forestry’s 2009 biennial “issue scan”. The list that follows is a condensed highlight of issues of particular importance to The Freshwater Trust, in terms of forest management as it relates to aquatic ecosystem conservation and recovery:</p> <p>G. Importance of "greatest permanent value" being defined with conservation in mind. Need to advance an economic vision that accounts for and highlights the contributions of non-timber benefits.</p>                                                                                 |                                                                           |
| <i>Staff Comments by:</i><br>State Forests | <p>The Board of Forestry has articulated the balancing of the social, economic, and environmental benefits through its forest management plans. These plans establish guiding principles, a vision, and goals for a wide range of forest resources, and establishes strategies for how to achieve those goals. The Board is considering how to "value" non-timber benefits derived through management of its lands under WP2, IBI 05. Efforts to provide economic values associated with many non-timber benefits (i.e., ecosystem services) are underway in Oregon, and nationally. However, methodology for measuring and valuing ecosystem services remains challenging, resulting in slow progress.</p> |                                                                           |

| <b>Monteverde, Gustavo</b>                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>Category: 3. General Comments Not Related to Specific Work Plan</b> |
|--------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|
| <b>Issue:</b> 194                          | <b>Title:</b> Long Term Mgt Plan - Freshwater                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>Subject:</b> State Forests - General                                |
| <i>Description</i>                         | <p>E. The need for firm adherence to a long term management plan without on-going threats of changes to plan by legislators, county commissioners, environmental groups, etc.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                        |
| <i>Staff Comments by:</i><br>State Forests | <p>The issue calls for "adherence to a long term management plan without ongoing threats of changes by legislators, county commissioners, environmental groups, etc." for Board of Forestry forest lands. Public land management recognizes the broad number of constituents and stakeholders interested in forest management. Achieving a balance of social, economic, and environmental values can be challenging, and requires sufficient time to consider all the information, ideas necessary to give voice to Oregonians. The forest management planning rules for these lands ensures public involvement in forest land planning (OAR 629-035-0080. These planning rules also include an adaptive management requirement. Adaptive management ensures new management practices and techniques are incorporated as new scientific information and monitoring results become available. The Board recently adopted performance measures as a key tool for evaluating the adequacy of forest management plans in achieving "greatest permanent value" (OAR 629-035-0020). Along with the measures, the Board adopted a biennial reporting cycle for these measures. These two-year reviews provide the Board an opportunity to adapt its management plans should the new information indicate a need.</p> |                                                                        |



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| <b><i>Mylrea, Lionel</i></b>                      | <b><i>Category: 2. Addressed in Current Work Plan</i></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                |
|---------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|
| <b><i>Issue:</i></b> 187                          | <b><i>Title:</i></b> Balanced Mgt - Mylrea                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b><i>Subject:</i></b> State Forests - General |
| <b><i>Description</i></b>                         | <p>All of Oregon's citizens must be treated equally. (Oregon Constitution Art. 1 Sec.1, 20, 33) All of the State Forest's public assets and benefits must be balanced to insure equal benefit for everyone throughout the future while creating jobs and tax revenue from tourism, recreation, fishing, logging, camping, photography, etc., now and in the future.</p> <p>Forest's carbon sequestration, clean, cool air, and water storage of our public forests must not be squandered to benefit a small group of people over the many users and citizens of the state and local regions. Whether BOF or CSF lands, they are all public lands. Fish and wildlife must not be compromised by department actions. Their habitat is required to be managed so they may benefit everyone in Oregon through wise conservation.</p> <p>To this end conservation of quality fish and wildlife habitat, headwater springs, seeps and streams must be well forested for protection from winter storms, summer heat, and to maintain biodiversity on the lands and in the soils and waters, controlling climate, flooding, water quality and quantity.</p> <p>Herbicide and nitrates are harmful to everything and everyone and against the public interest. They must be replaced with partial shade, narrow clearcuts that don't run east to west, and cutting. Clearcuts must be small, but can dot more level landscapes where there is no history or threat of landslides.</p> |                                                |
| <b><i>Staff Comments by:</i></b><br>State Forests | <p>This commenter affirms many of the fundamental components of the statutes and administrative rules governing management on Board of Forestry lands. The balancing of the economic, social and environmental benefits provided through management of these lands is challenging. This discussion is occurring under the Board's WP2, IBI 1, 5 and 6.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                |

| <b><i>Nelson, Jan</i></b>                                    | <b><i>Category: 2. Addressed in Current Work Plan</i></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                          |
|--------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|
| <b><i>Issue:</i></b> 190                                     | <b><i>Title:</i></b> FPFO Strategies and Vision                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b><i>Subject:</i></b> Board of Forestry |
| <b><i>Description</i></b>                                    | <p>I agree with your mission statement. I support a vision of sustaining healthy forests. Forests here were healthy 200 years ago. We know there were fires, infestations and other natural occurrences. The difference now is massive human intervention within these forests. They include too much logging and pesticide use.</p> <p>More than 500 words could be written to explain why human forest practices have been responsible for the catastrophic destruction caused by 20th century forest practices. The vision of a BoF as an impartial body would be a good idea. People with vested interests in profiting from decisions should not be on a Board.</p> <p>I fully support the general ideas of STRATEGIES D, E, F, and G, but your stated methods for doing that, as listed within those categories are counterproductive. In fact many strategies are reflected in the cognitive dissonance of logging the forest at the same time you protect the forest environment.</p> |                                          |
| <b><i>Staff Comments by:</i></b><br>Forest Resource Planning | <p>The commenter raises concerns about the effects of 20th Century human disturbance to Oregon forests. High level elements of the Forestry Program for Oregon framework are perceived to be valuable, but concerns about specific strategies and actions, as well as the impartiality of the Board itself, are raised. Board of Forestry composition is a legislative issue. However, the</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                          |



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other comments are relevant to the planned 2011 Forestry program for Oregon update process.

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|---------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| <b>Nelson, Joel</b>                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 165                                 | <b>Title:</b> Adequate Fire Capacity - Plum Creek                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <b>Subject:</b> General Forest Policy              |
| <b>Description</b>                                | <p>I am writing on behalf of Plum Creek Timber Company to provide brief input on what we believe are the most important forest-related issues in Oregon today, and what the Board's priorities should be. Our thoughts on this are guided by the current economic conditions and the extremely difficult times that face the forest products industry.</p> <p>There are two areas we believe deserve the full attention of the Board of Forestry. First, the public needs reassurance that the Forest Practices Act is being implemented and public resources are being protected on private forestland. Second, there needs to be adequate funding and the infrastructure to protect Oregon's forests from devastation by wildfire.</p> <p>When the economy improves, there will be time to revisit the Forestry Program for Oregon and update the associated work plans and indicators. Plum Creek will gladly participate more fully at that time.</p> <p>Thank you for the opportunity to comment.</p> |                                                    |
| <b>Staff Comments by:</b><br>Protection from Fire | <p>In the Forestry Program for Oregon, Strategy "F", the Board promotes the funding for the Protection From Fire Program to maintain the most efficient level.</p> <p>With regard to Forest Practices Act Administration, see staff response to Issue Scan ID # 180.</p> <p>With regard to Board of Forestry strategic planning, see staff response to Issue Scan ID # 10.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                    |

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|----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| <b>Nelson, Joel</b>                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 180                            | <b>Title:</b> Public Reassurance on FPA                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Subject:</b> Forest Practices - General         |
| <b>Description</b>                           | <p>I am writing on behalf of Plum Creek Timber Company to provide brief input on what we believe are the most important forest-related issues in Oregon today, and what the Board's priorities should be. Our thoughts on this are guided by the current economic conditions and the extremely difficult times that face the forest products industry.</p> <p>There are two areas we believe deserve the full attention of the Board of Forestry. First, the public needs reassurance that the Forest Practices Act is being implemented and public resources are being protected on private forestland. Second, there needs to be adequate funding and the infrastructure to protect Oregon's forests from devastation by wildfire.</p> <p>When the economy improves, there will be time to revisit the Forestry Program for Oregon and update the associated work plans and indicators. Plum Creek will gladly participate more fully at that time.</p> <p>Thank you for the opportunity to comment.</p> |                                                    |
| <b>Staff Comments by:</b><br>Private Forests | <p>Funding for the Private Forests Division; Reassure the Public</p> <p>The Board recognizes the need for stable, adequate funding for the Private Forests Division so that staff can assist landowners in sustainable forest management and to reassure the public that resources are being protected. The primary board issue in Work Plan 6 Private Forests addresses this issue, as does the Private Forestlands Issue Paper currently under review by the</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                    |



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Board. However, the issue is not yet directly addressed in an IBI.  
Also see staff response, Issue # 10

| <b>Nichols, Nancy</b>                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <b>Category: 2. Addressed in Current Work Plan</b> |
|-------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| <b>Issue:</b> 22                                | <b>Title:</b> Update Herbicide Regulations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Subject:</b> Forest Practices - Pesticides      |
| <i>Description</i>                              | <p>Regulations on herbicide application needs to be updated. There have been a number of studies done since the regulations were adopted. We need to base state policies on the best available science. A transparent public review addressing the affects of the transport and breakdown of herbicides throughout the system needs to be held. The review should also include studies on the affects of herbicides on human and aquatic life to determine what level can be considered safe.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                    |
| <i>Staff Comments</i><br>by:<br>Private Forests | <p><b>Pesticide Literature Review and Use of Best Available Science</b><br/>Under Topic 4 (Pesticides) of the Work Plan #6 (Private Forests), the requested Board Product was a summary of the Department role and responsibilities in terms of policy and monitoring, proactive participation, and maintaining current scientific information on pesticides. That issue paper was delivered to the Board in April 2009. A comprehensive review of forest chemicals is identified as a top priority question in the 2002 Forest Practices Monitoring Program Strategic Plan. Items in the Monitoring Strategy are completed as resources and priorities allow. Staff keep abreast of current research on a vast array of natural resource topics through the literature search services available from the State Library, by sharing information between staff, by receiving information from other agencies and contacts, and by attending conferences. Given the landscape-level use of pesticides, the potential for cumulative, synergistic, or additive effects, and the toxicological knowledge available in other agencies (Department of Environmental Quality, Department of Human Services, Oregon State University, etc.), collaborative efforts on the potential impacts of pesticides and other toxins is considered the most effective and efficient means for the Department to address this issue. The Department is participating in a number of collaborative efforts (see #22) and will also work with DEQ as it progresses on the Toxins Reduction Strategy and Senate Bill 737. This is a key opportunity for collaborative pesticides monitoring and to identify reduction opportunities.</p> <p style="text-align: center;">See staff response, Public Health, issue ID # 20</p> |                                                    |

| <b>Nicholson, Eric</b>                          |                                                                                                                                                                                                                                                                                                                           | <b>Category: 2. Addressed in Current Work Plan</b> |
|-------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| <b>Issue:</b> 132                               | <b>Title:</b> Pesticide Use - Nicholson                                                                                                                                                                                                                                                                                   | <b>Subject:</b> Forest Practices - Pesticides      |
| <i>Description</i>                              | <p>I am writing because the issue of herbicide spraying is so important for everyones health! We definitely need a buffer zone (at the very least) to stop pesticide spraying near our homes! Many people have been caught unprepared and there is really no way to prepare for herbicide spraying our water and air.</p> |                                                    |
| <i>Staff Comments</i><br>by:<br>Private Forests | <p>See staff response, Buffers for Pesticide Application, issue ID # 20<br/>See staff response, Public Health, issue ID # 20</p>                                                                                                                                                                                          |                                                    |



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|---------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|
| <b>Nicholson, Eric</b>                      |                                                                                                                                                                                         | <b>Category:</b> 4a. Outside Board Purview |
| <b>Issue:</b> 133                           | <b>Title:</b> BOF Conflict of Interest - Nicholson                                                                                                                                      | <b>Subject:</b> Board of Forestry          |
| <i>Description</i>                          | <p>BOF members should not have financial interests in the timber industry! It has been brought to my attention that at least two do!</p> <p>Thank you for listening to my concerns.</p> |                                            |
| <i>Staff Comments by:</i><br>Agency Affairs | Please refer to issue 16                                                                                                                                                                |                                            |

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|----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| <b>Owen, Day</b>                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>Category:</b> 2. Addressed in Current Work Plan |
| <b>Issue:</b> 197                            | <b>Title:</b> Buffer Zones - Pitchfork Rebellion                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <b>Subject:</b> Forest Practices - Pesticides      |
| <i>Description</i>                           | <p>We want a minimum QUARTER MILE AERIAL SPRAY BUFFER ZONE as a minimal FIRST STEP in what should be a VIGEROUS AND ONGOING PROCESS OF PESTICIDE REFORM in the Forests of Oregon.</p> <p>Explanation of Issue One: We believe it is scandalous that their currently is not legal buffer zone in regard to how close a timber industry helicopter can spray pesticide next to a home or school. (Note: We are using the term "pesticide" as does the Environmental Protection Agency, as a broad term that includes herbicides, fungicides, and rodent poisons.</p> <p>See PDF for remaining text.</p> |                                                    |
| <i>Staff Comments by:</i><br>Private Forests | See staff response, Buffers for Pesticide Application, issue ID # 20                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                    |

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|---------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|
| <b>Owen, Day</b>                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Category:</b> 4a. Outside Board Purview |
| <b>Issue:</b> 198                           | <b>Title:</b> Ethics - Pitchfork Rebellion                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <b>Subject:</b> Board of Forestry          |
| <i>Description</i>                          | <p>We want the Oregon Board of Forestry to Vote on Whether or Not they Support Our Call for THE STATE OF OREGON TO ADOPT FEDERAL ETHICS/ANTI-CORRUPTION STANDARDS IN RELATION TO THE OREGON BOARD OF FORESTRY.</p> <p>Explanation of Issue Two: The Pitchfork Rebellion hereby formally announces that we have launched a campaign to reform the Oregon Board of Forestry. Specifically, this campaign seeks to put an end to the State-sanctioned financial conflict of interest that now exists on the Board of Forestry.</p> <p>See PDF for remaining text.</p> |                                            |
| <i>Staff Comments by:</i><br>Agency Affairs | The comment speaks primarily to concerns about conflict of interest arising from the current Board composition. Please refer to issue 16. Concerns raised as part of this particular comment regarding herbicide use are addressed elsewhere in the issue scan analysis.                                                                                                                                                                                                                                                                                           |                                            |



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| <i>Owen, Day</i>                             |                                                                                                                                                                                                                                                                                                                                                                                                                        | <i>Category: 2. Addressed in Current Work Plan</i> |
|----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| <b>Issue:</b> 199                            | <b>Title:</b> Endorse Buffer Zone - Pitchfork Rebellion                                                                                                                                                                                                                                                                                                                                                                | <b>Subject:</b> Forest Practices - Pesticides      |
| <i>Description</i>                           | <p>We want the Oregon Board of Forestry to vote on item number one of the proposal we submitted at their April 2008 meeting.</p> <p>Explanation of Issue Three: The proposal we made at the April 2008 meeting of the Board of Forestry was in response to the results of the 2007 issue scan in which the public chose herbicide sprays in the forest as the number one issue.</p> <p>See PDF for remaining text.</p> |                                                    |
| <i>Staff Comments by:</i><br>Private Forests | See staff response, Buffers for Pesticide Application, issue ID # 20                                                                                                                                                                                                                                                                                                                                                   |                                                    |

| <i>Owen, Day</i>                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <i>Category: 1c. New Topic: Additional Staff Work- Possible Board Action</i> |
|----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------|
| <b>Issue:</b> 200                            | <b>Title:</b> Manual Release Pilot Program                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Subject:</b> Forest Practices - Pesticides                                |
| <i>Description</i>                           | <p>We want the Board of Forestry to Launch a Manual Release Pilot Program in Our Home Bioregion of the Highway 36 Corridor.</p> <p>Explanation of Issue Four: We realize that change is gradual. We want more manual release of weeds and invasive species and less herbicide sprays. Thus we call for the BOF to plan and launch a Manual Release Pilot Program in our home bioregion of the Highway 36 Corridor. Tax incentives or some other financial incentive could be given to private timber companies who will each agree to designate one track of their land holdings in our bioregion as Manual Release Test Program locations. If no private timber company agrees to participate, a partnership program between the ODF and the BLM can be pursued.</p> <p>See PDF for remaining text.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                              |
| <i>Staff Comments by:</i><br>Private Forests | <p>Manual release is one method to be considered in an integrated pest management (IPM) approach. IPM is a voluntary process under which operators and landowners can choose the tools to achieve their site-specific objectives (OAR 629-620-000(2)). Forest landowners have the discretion to select among available vegetation management practices, including herbicide applications, as long as the practices comply with applicable regulations. Based on ORS 527.630(1), economic efficiency in forest practices, including vegetation management, is encouraged, as long as the practices are consistent with sound management of soil, air, water, and fish and wildlife resources. See staff response, End Pesticides, issue ID # 11 for an outline of regulations applicable to forest pesticide use.</p> <p>It appears that the objective of the proposed manual release pilot program would be to encourage one or more forest landowners to increase the use of manual release for vegetation management and reduce the use of herbicides. A funding source would be needed for such a program; it is unlikely that state funding would be available in the near future, but there might be other sources. The Department views increased support for IPM on forestland as being more aligned with state and Board policies than conducting a manual release pilot program. Singling out and supporting one piece of IMP over another does not fit with current Board</p> |                                                                              |



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policy. Implementing a manual release pilot program might indicate that the Board is implicitly adopting a policy of reducing herbicide use on forestland. The Board should consider whether it wants to adopt such a policy. Staff support time allocated to this issue would take resources from other priority work.

**Peltier, David**

**Category: 2. Addressed in Current Work Plan**

**Issue: 8**

**Title:** Misc. Suggestions: Affordable housing, sustainable jobs, healthy communities

**Subject:** Economic Framework

**Description**

Dear Board, our people need affordable housing. Our people need jobs. Let us explore creating new forestry products/building materials out of "waste". A new non-toxic glue has been invented. We can use "waste" products better. Let us do selective harvesting, rather than clearcuts. Let us NOT use herbicides!!! Young people are not going into forestry/logging because it has been a boom & bust market. Let us create sustainable jobs, and healthy communities. I'm a sustainable forester. I need a small portable mill. I am a semi-retired housebuilder.

We can create jobs by thinning the Oregon forests carefully, reducing fire risk and creating usable products. We need a CETA/PSE type federal job-creating structure to train young people in forestry methods. Oregon has world-class forests. We liquidate them and then don't replant right away, which is ludicrous. Here on the coast we have huge levels of underbrush growth and invasive species moving in. Foresters do not replant fast enough!. Angell Job Corps. here in Yachats, OR educates young people. They built a low-cost mill. We need to harness the energy of youth, so that they can have a good life.(instead of crime!) Please e-mail me, and come see our coastal forest!

**Staff Comments by:**  
Forest Resource Planning

The issues cited largely revolve around forest cluster economic development and forest management practices. Through the Forest Vitality Work Plan the Board has directed ODF to craft a new forest cluster economic development strategy in coordination with OECD, OSU, and OFRI. The strategy currently focuses on three themes: federal forest restoration, forest cluster vitality, and forestry workforce. Commenter engagement in ongoing discussions on implementing the existing forest cluster economic development strategy may be the best avenue to address the commenter's concerns regarding employment, wood products innovation, forest restoration, community vitality, and worker training. Issues specific to harvesting methods, reforestation, and chemical use are addressed through Forest Practices Act administration by the Private Forests Program.

**Poddar, Bhagwati**

**Category: 3. General Comments Not Related to Specific Work Plan**

**Issue: 4**

**Title:** Board Perspective

**Subject:** Board of Forestry

**Description**

The second issue, perhaps the most important issue, is the Board itself. Is the Board educable? Can it understand that the overwhelming majority of Oregonians is urbanized? Can it understand that the things that Oregonians most cherish about their state are the forests, the streams and the quality of life to which both are integral? Can it understand that that's what attracted them here in the first place and keeps them here? Can it understand that A TREE FARM IS NOT A FOREST and that the Board's obsession with clear cutting is the very antithesis of the quality of life that Oregonians prize and want for themselves and their children? Can the Board understand that it cannot have its cake and eat it too, that is, protect the



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quality of life while cutting down the forests and replacing it with tree farms? Can it understand that it cannot serve the timber industry fully and yet serve the permanent interest of all Oregonians in their forests and streams? Can it understand that, in a world in which the quality of water is becoming a superceding concern and where a very few of the old growth forests remain, it must compromise? Can it understand that substituting thinning for clear cutting although it will satisfy neither the timber industry nor the no-clear-cut proponents is an alternative worth pursuing if the Board wishes to wean itself from the addiction to clear cutting?

*Staff Comments*  
 by:  
 Agency Affairs

This submission addresses Board members' values, perceptions, and general approaches. The Board's mission, strategies, visions and values, as expressed in the Forestry Program for Oregon, speak to forests that sustainably produce a full range of environmental, economic and social values. The Board has addressed specific issues associated with this comment, advocating increased thinning on federal lands, receiving reports on public polling, seeking a state forests management plan that balances values, sponsoring legislation that has strengthened stewardship agreements, etc. The issues raised in the comment thus are addressed in multiple work plans. In general, the comment indicates the challenge of addressing multiple interests, something the Board may regard as a theme in much of its work.

***Poddar, Bhagwati***

***Category: 3. General Comments Not Related to Specific Work Plan***

***Issue: 7***

***Title: Stream Buffers***

***Subject: Forest Practices - Riparian Management***

*Description*

There are two very important issues confronting the Board. The first of those is the issue of buffers for small streams, perennial and intermittent. The Board has, despite clear cut science, pussyfooted around that issue numerous times because it does not wish to offend its primary client, the timber industry. Although the Board pretends to represent the public, it does not, either in the manner of its composition or the policies it supports and makes. If Board were to follow the science and increase the no-cut buffers for small streams to 100 feet, it would, specially in the western portion of the state, bring down upon itself the wrath of that small minority to which the Board owes it allegiance, the timber industry. But if the Board truly represented the public weal, it would follow the science where it leads and let the chips fall where they will.

*Staff Comments*  
 by:  
 Private Forests

The Board directed in April 2009 that concerns about wood recruitment on small and medium fish bearing streams and temperature on small non-fishbearing streams be addressed through voluntary measures under the Oregon Plan for Salmon and Watersheds (see Agenda Item #2, "FPAC Rule Concepts 8 and 12" for background). Key reasons for this approach include concerns about the science available to support necessary rule-change findings under ORS 527.714 and the desire to encourage non-regulatory methods in alignment with Forestry Program for Oregon Strategy A, Action A.7.. This approach was further supported due to ongoing policy, regulatory, research, and monitoring efforts to review and improve forest practices resource protection.



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|-------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------|
| <b>Ragon, Robert E.</b>                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>Category: 2. Addressed in Current Work Plan</b>                           |
| <b>Issue:</b> 36                                      | <b>Title:</b> Refine Indicators                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>Subject:</b> Sustainability Indicators                                    |
| <b>Description</b>                                    | <p>Sustainability of the Common School School Fund lands must be measured in the context of the State Forester fulfilling the State Land Board's trust responsibility to manage the Common School Fund in accordance with the constitutional mandates.</p> <p>See PDF for remaining text</p>                                                                                                                                                                                                                                                                                                                                                               |                                                                              |
| <b>Staff Comments by:</b><br>Forest Resource Planning | <p>These comments focus on the the scope, specificity, and application of Oregon Indicators of Sustainable Forest Management, particularly those indicators dealing with social and economic benefits. The current Oregon indicators were developed by an ad hoc cistizen advsiory committee to the Board. Through the Board's Strategic Planning, Implementation, and Monitoring Work Plan, a process has been proposed for greater citizen participation in interpreting and reporting indicator results. Review and possible revision of the indicators is included as a periodic product of this Work Plan.</p>                                        |                                                                              |
| <b>Rebar, Bryan</b>                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>Category: 2. Addressed in Current Work Plan</b>                           |
| <b>Issue:</b> 29                                      | <b>Title:</b> Pesticides Scientific Evidence                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>Subject:</b> Forest Practices - Pesticides                                |
| <b>Description</b>                                    | <p>I want to urge to the board to consider what scientific evidence there is for the impacts of commonly used forestry herbicides on human health and ecosystem health. It is my understanding that, in response to a large number of concerns expressed about this issue during the last comment period two years ago that the Board recommended a literature search, but this was never carried out. This does not speak well of the Board or the comment process. Good forestry policies can only be made when comments are taken seriously and scientific evidence is fully considered. I look forward to seeing action in response to my concern.</p> |                                                                              |
| <b>Staff Comments by:</b><br>Private Forests          | <p>See staff response, Pesticide Literature Review and Use of Best Available Science, issue ID # 22</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                              |
| <b>Redisch, Meryl</b>                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>Category: 1c. New Topic: Additional Staff Work- Possible Board Action</b> |
| <b>Issue:</b> 195                                     | <b>Title:</b> Unified Urban Forestry                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>Subject:</b> Urban Forestry                                               |
| <b>Description</b>                                    | <p>The majority of our world's population live in urban centers. Oregon is no different. The myriad of ecosystem services that urban forests contribute to healthy and livable cities should not be overlooked.</p> <p>See PDF for remaining text.</p>                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                              |
| <b>Staff Comments by:</b><br>Urban Forestry           | <p>This comments relates to the role of urban forestry among the Department's policies. There is considerable public interest around the concept of ecosystem services, and the role that all forests, not just rural ones, play in providing a healthy environment and economy. The writer correctly points out that Oregon has many more urban residents than rural ones, and a</p>                                                                                                                                                                                                                                                                      |                                                                              |



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continuing concern for them is the lack of attention that urban forests receive in the overall vision for forests in Oregon. The writer requests that the Board develop specific policies and plans for expanding and funding the urban forestry program. This subject was the topic of a previous Board work plan (#4) which is now closed, but is not currently specifically being addressed in existing work plan proposals.

**Robertson, Paul**

**Category: 2. Addressed in Current Work Plan**

**Issue:** 24

**Title:** Herbicides Literature Review.doc

**Subject:** Forest Practices - Pesticides

**Description**

The Devils Lake Water Improvement District (a local government charged with protection of Devils Lake, Lincoln County, Oregon, www.DLWID.org) has been in the process of developing a watershed management plan for Devils Lake. This plan incorporates many best management strategies and lake restoration projects. Included in the plan is a call for toxicant reduction and abatement. This includes herbicides and pesticides, much of which might be sprayed on timberland. As much of the watershed is timber land, DLWID is interested in developing relationships with entities potentially using such pesticides to develop means of reducing and eventually eliminating the release of these chemicals into the environment. The biggest threat from these chemicals may come from the synergistic effects of mixing chemicals in the environment, something safety labels for use fail to recognize. DLWID encourages Oregon Department of Forestry to work proactively to conduct the literature review to seek out the consequences of ongoing pesticide use, and to especially seek chronic effects not regularly vetted by traditional chemical company or US EPA protocols.

**Staff Comments by:**

See staff response, General Concern about Pesticides, issue ID # 11

Private Forests

See staff response, Pesticide Literature Review and Use of Best Available Science, issue ID # 22

See staff response, Pesticide Monitoring, issue ID # 23

**Ross, Elena**

**Category: 2. Addressed in Current Work Plan**

**Issue:** 120

**Title:** Herbicide Use - Ross

**Subject:** Forest Practices - Pesticides

**Description**

I am interested in a buffer zone on spraying herbicides & pesticides near homes & school.

**Staff Comments by:**

See staff response, Buffers for Pesticide Application, issue ID # 20

Private Forests

**Ross, Elena**

**Category: 4a. Outside Board Purview**

**Issue:** 121

**Title:** BOF Conflict of Interest - Ross

**Subject:** Board of Forestry

**Description**

That we end financial conflict on the BOF



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| <i>Staff Comments</i> | Please refer to issue 16 |
| <i>by:</i>            |                          |
| Agency Affairs        |                          |

|                       |                                                                                                             |                                            |
|-----------------------|-------------------------------------------------------------------------------------------------------------|--------------------------------------------|
| <b>Ross, Elena</b>    | <b>Category:</b> 1b. New Topic: Incorporate Input Into Existing Work Plan                                   |                                            |
| <b>Issue:</b> 122     | <b>Title:</b> Diverse Forests - Ross                                                                        | <b>Subject:</b> Forest Practices - General |
| <i>Description</i>    | To replant the clear cut forest units with a variety of trees so that there is a better ecological balance. |                                            |
| <i>Staff Comments</i> | See staff response, Diverse forests, native plants; no monocultures, Issue ID # 59                          |                                            |
| <i>by:</i>            |                                                                                                             |                                            |
| Private Forests       |                                                                                                             |                                            |

|                         |                                                                                                                        |                                               |
|-------------------------|------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|
| <b>Safehaven, Avery</b> | <b>Category:</b> 2. Addressed in Current Work Plan                                                                     |                                               |
| <b>Issue:</b> 125       | <b>Title:</b> Pesticide Use - Safehaven                                                                                | <b>Subject:</b> Forest Practices - Pesticides |
| <i>Description</i>      | Please desist spraying and using herbicides in Oregon forests especially near populated areas and/or private property. |                                               |
| <i>Staff Comments</i>   | See staff response, Buffers for Pesticide Application, issue ID # 20                                                   |                                               |
| <i>by:</i>              | See staff response, General Concern about Pesticides, issue ID # 11                                                    |                                               |
| Private Forests         |                                                                                                                        |                                               |

|                         |                                                                                                 |                                   |
|-------------------------|-------------------------------------------------------------------------------------------------|-----------------------------------|
| <b>Safehaven, Avery</b> | <b>Category:</b> 4a. Outside Board Purview                                                      |                                   |
| <b>Issue:</b> 126       | <b>Title:</b> BOF Conflict of Interest - Safehaven                                              | <b>Subject:</b> Board of Forestry |
| <i>Description</i>      | Please end the financial conflict of interest that exist now on the Oregon's Board of Forestry. |                                   |
| <i>Staff Comments</i>   | Please refer to issue 16                                                                        |                                   |
| <i>by:</i>              |                                                                                                 |                                   |
| Agency Affairs          |                                                                                                 |                                   |

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| <b>Safehaven, Avery</b> | <b>Category:</b> 3. General Comments Not Related to Specific Work Plan |                                            |
| <b>Issue:</b> 127       | <b>Title:</b> Clearcutting - Safehaven                                 | <b>Subject:</b> Forest Practices - General |
| <i>Description</i>      | Please stop logging in old & especially ancient forests.               |                                            |
| <i>Staff Comments</i>   | See staff response, protect old forests, issue # 60                    |                                            |
| <i>by:</i>              |                                                                        |                                            |
| Private Forests         |                                                                        |                                            |



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| <b>Schlenoff, Debbie</b>  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Category: 2. Addressed in Current Work Plan</b> |
|---------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| <b>Issue:</b> 177         | <b>Title:</b> Pesticide Movement - Schlenoff                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>Subject:</b> Forest Practices - Pesticides      |
| <i>Description</i>        | <p>I am submitting comments on behalf of the Lane County Audubon Society. Our members value Oregon forests for the recreational opportunities that they provide, as habitat for fish and wildlife, and for the important role that they play in providing clean air and water, and in carbon sequestration. We are concerned with the widespread use of herbicides in the forestry program and the potential impact of these poisons on environmental health and human health, water quality, fish and wildlife. Chemicals are carried through the ecosystem both in the soil and in the water. A 2000-2005 US Geological Survey (USGS) study found a variety of pesticides in water samples. Various herbicides have been shown to negatively impact fish, aquatic invertebrates, amphibians, birds, and mammals including humans. It is important that we have a better understanding of how and where these chemicals move as well as the impact they have on the ecosystem.</p> |                                                    |
| <i>Staff Comments by:</i> | See staff response, General Concern about Pesticides, issue ID # 11                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                    |
| Private Forests           | See staff response, Buffers for Pesticide Application, issue ID # 20                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                    |
|                           | See staff response, Pesticide Literature Review and Use of Best Available Science, issue ID # 22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                    |
|                           | See staff response, Pesticide Monitoring, issue ID # 23                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                    |
|                           | See staff response, Public Health, issue ID # 20                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                    |

| <b>Schlossberg, Josh</b>  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Category: 2. Addressed in Current Work Plan</b> |
|---------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| <b>Issue:</b> 20          | <b>Title:</b> Stop Pesticide Use, Clearcutting                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Subject:</b> Forest Practices - Pesticides      |
| <i>Description</i>        | <p>Pesticides are deadly toxics that contaminate drinking water sources and drift through the air for miles. I personally know several individuals, including most of a family, that have sought medical treatment after their exposure to pesticides.</p> <p>Many members of the public are requesting buffer zones around their property and homes, yet are being ignored. This is a human rights issue and needs to be addressed without further delay.</p> <p>Our position: Stop clearcutting and you won't need the pesticides.</p>                                           |                                                    |
| <i>Staff Comments by:</i> | Buffers for Pesticide Application                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                    |
| Private Forests           | <p>The authority to "...establish limitations and procedures deemed necessary and proper for the protection of persons..." on the uses or applications of pesticides resides within the Department of Agriculture (ODA) (ORS 634.322(6)). The regulatory authority of the Board of Forestry is further clarified in a 1995 Memorandum of Agreement with ODA to be limited to prescribing best management practices for pesticides relative to natural resources on forestlands. The Board of Forestry cannot set buffers around schools, homes or private property boundaries.</p> |                                                    |
|                           | Public Health                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                    |



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The authority to "...establish limitations and procedures deemed necessary and proper for the protection of persons..." on the uses or applications of pesticides resides within the Department of Agriculture (ODA) (ORS 634.322(6)). This issue is outside Board purview.

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| <b>Schmidt, Mark</b>      |                                                                      | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 136         | <b>Title:</b> Pesticide Use - Schmidt                                | <b>Subject:</b> Forest Practices - Pesticides      |
| <i>Description</i>        | We need a buffer zone to stop spraying pesticide near homes.         |                                                    |
| <i>Staff Comments by:</i> | See staff response, Buffers for Pesticide Application, issue ID # 20 |                                                    |
| Private Forests           |                                                                      |                                                    |

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| <b>Schmidt, Mark</b>      |                                                             | <b>Category: 4a. Outside Board Purview</b> |
| <b>Issue:</b> 137         | <b>Title:</b> BOF Conflict of Interest - Schmidt            | <b>Subject:</b> Board of Forestry          |
| <i>Description</i>        | BOF members should not have financial conflict of interest. |                                            |
| <i>Staff Comments by:</i> | Please refer to issue 16                                    |                                            |
| Agency Affairs            |                                                             |                                            |

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| <b>Schmidt, Mark</b>      |                                                                                    | <b>Category: 1b. New Topic: Incorporate Input Into Existing Work Plan</b> |
| <b>Issue:</b> 138         | <b>Title:</b> Diverse Forests - Schmidt                                            | <b>Subject:</b> Forest Practices - General                                |
| <i>Description</i>        | Please plant only native plants.                                                   |                                                                           |
| <i>Staff Comments by:</i> | See staff response, Diverse forests, native plants; no monocultures, Issue ID # 59 |                                                                           |
| Private Forests           |                                                                                    |                                                                           |

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| <b>Sebring, Linda</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 170     | <b>Title:</b> Drinking Water Effects - Sebring                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Subject:</b> Forest Practices - Pesticides      |
| <i>Description</i>    | <p>My concerns are about Quality of Drinking water and contamination of watersheds by application (aerial and ground) of herbicides, pesticides and the carrier agents used with these poisons.</p> <p>Dioxin is the most toxic chemical that threatens human health. Herbicides which contain this as a by product of their manufacture must be phased out and alternatives found.</p> <p>The cost for society to care for the diseases these chemical management schemes produce is far</p> |                                                    |



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greater than the cost of alternative manual management and would produce jobs for Oregonians.

*Staff Comments by:*  
 Private Forests See staff response, General Concern about Pesticides, issue ID # 11  
 See staff response, Public Health, issue ID # 20

**Shinn, Craig W.**

**Category:** 1b. New Topic: Incorporate Input Into Existing Work Plan

**Issue:** 211

**Title:** Committee for Family Forestlands Comments

**Subject:** Family Forestlands

*Description*

The Committee for Family Forestlands (CFF) is providing this letter as a formal document to the Board’s 2009 issue scan. The CFF continues to draw direction from the second family forestland symposium, Looking Forward II, Oregon Families & Their Forestlands: What’s at Stake. One of the purposes of the Symposium was the development of potential solutions to issues challenging family forestland viability. The CFF developed a forward working agenda by prioritizing symposium outputs during 2007-2008; the prioritized agenda (attached) was reported to the Board in July 2008 as a part of our annual report. We developed this working agenda using as guidance the Forestry Program for Oregon and Oregon Indicators of Sustainable Forest Management.

See PDF for remaining text.

*Staff Comments by:*  
 Private Forests

The Committee for Family Forestlands (CFF) is a standing committee appointed by the Board of Forestry. Committee members closely monitor the effects of policy changes and other actions that affect family forestland owners and help develop policy, as necessary. Their guidance is very helpful in determining the type and level of assistance family forestland owners need.

The CFF has been very active in shaping Board of Forestry policy related to family forestland. At their July, 2008 meeting, the Board directed the department to address family forestland issues raised by the April 2007 Symposium, the Board’s (2007) issue scan, and the related CFF report in the revision of the Private Forests work plan.

The Department has included these topics in the revision of the Private Forests work plan, and incorporated these concerns in Intermediate Board Issue 0 (IBI 0), the primary Board issue: “How will the Board clarify current Private Forests program policy governance—at the statutory level, Forestry Program for Oregon strategic planning level, or otherwise—to effectively address the current and emerging challenges on private forestlands in order to fully realize the Forestry Program for Oregon vision of sustainable forest management across all Oregon’s forestlands?”

Under IBI 0, the Board is developing policy objectives for private forestlands. The issues raised by the CFF are addressed in the policy objectives as noted in the CFF issue scan letter. The specific discussion in the CFF letter can inform the Board of Forestry on relative priorities for these policy objectives.



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| <b>Springer, Gary</b>                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>Category: 3. General Comments Not Related to Specific Work Plan</b> |
| <b>Issue:</b> 161                           | <b>Title:</b> Focus on Core Missions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <b>Subject:</b> General Forest Policy                                  |
| <b>Description</b>                          | <p>Concentrate on Core Missions – This is certainly not a time for “mission creep”, or expansion of non-core mission activities. It will be a struggle for at least the near future for the Department to adequately cover the bases of core functions: fire prevention, fire suppression, Forest Practices Act implementation, landowner assistance, and keeping the wheels turning on State Forest lands. By necessity, there will be some degree of minimization amongst all those core mission activities. It is a time to be clear and honest about the differences between discretionary and non-discretionary functions. It is a time to do the best job possible on the non-discretionary tasks...the things that by law the Department and Board must do...and to set aside for better times everything else.</p>                                                                                                                |                                                                        |
| <b>Staff Comments by:</b><br>Agency Affairs | <p>This commenter reflects on the current economic difficulties and calls for a focus on core missions, with a temporary setting aside of non-discretionary tasks. Statutorily mandated responsibilities such as fire protection, state lands management, Forest Practices Act enforcement and landowner assistance maintain high-priority positions. The Board also historically has placed high emphasis on strategic planning, monitoring outcomes, and generally striving to achieve the vision and mission of the Forestry Program for Oregon. One view might hold that these activities can be suspended when resources are scarce. Another is that prioritizing and planning remain important - although the resources available for them may be reduced - to maintain effectiveness in a challenging economic environment, and to position the agency for the future. The Board's Work Plan 1 speaks to these considerations.</p> |                                                                        |

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| <b>Springer, Gary</b>                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 162                                     | <b>Title:</b> Action on FFAC - Springer                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Subject:</b> Federal Lands                      |
| <b>Description</b>                                    | <p>2009 Board of Forestry Issue Scan<br/>         Thoughts from Gary Springer, Starker Forests<br/>         May 22, 2009</p> <p>Federal Forest Issues – Continue to try to move the Federal Forests Advisory Committee report on to action, as resources allow. While I certainly don't agree with everything in the report, it represents our states, or perhaps anyone's best attempt yet to encourage sensible management on federal forests, since the enactment of the Northwest Forest Plan. It represents the collective desires of a very diverse set of Oregonians who share concerns over the deteriorating condition of federal forests and local economies that depend on those forests. Press our congressional delegation and federal forest leaders to start implementing actions called for in the report. Rural Oregon economies in much of the state and east of the Cascades in particular are hurting due in part to inaction on these forests. And catastrophic fire risk continues to climb in those forests for the same reason.</p> |                                                    |
| <b>Staff Comments by:</b><br>Forest Resource Planning | <p>ODF will continue to work toward implementing the recommendations in the FFAC Report. The Governor's Office has convened a group of interested stakeholder willing to work on implementing the recommendations. ODF will continue to participate in that process, as budget conditions allow.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                    |



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| <b>Springer, Gary</b>                       | <b>Category: 1b. New Topic: Incorporate Input Into Existing Work Plan</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                       |
| <b>Issue:</b> 163                           | <b>Title:</b> Strengthen Partnerships                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>Subject:</b> General Forest Policy |
| <i>Description</i>                          | <p>Strengthen Collaborative Partnerships – Now more than ever, the Board and Department need to work with landowners to shore up long term partnerships in both Forest Practices Act implementation and fire protection. Next biennium’s budget outcomes for the Department are yet to be resolved, but it is clear that all three major programs will be substantially reduced in capacity when the dust settles at the end of the legislative session. The only good news here is that we already have a strong state/landowner partnership in fire and private forests program implementation. Trained ODF employees in these two programs will be fewer and farther between, with greater work loads over the next two years. Landowners and operators will need to do more for themselves when it comes to forest practices and fire protection matters. Educational outreach about this issue needs to occur, with roles for ODF, landowner organizations and other groups such as Society of American Foresters, consulting foresters, OFRI and Extension Service, possibly through the Master Woodland Manager program.</p> |                                       |
| <i>Staff Comments by:</i><br>Agency Affairs | <p>The comment calls for strengthening partnerships, particularly in Forest Practices Act implementation and fire protection, and increased educational outreach at a time when landowners will be called upon to do more on their own. These concerns are framed to some degree in the Board's Wildfire Risk Management and Private Forests work plans. Among other things, the former addresses collaborative fuels reduction and planning approaches, while the latter's features include efforts to promote long-term investments by forest landowners and to assist family forestland owners in addressing the challenges they face. At the staff level, the department has formed a work group to examine current education and outreach efforts across the agency, and to recommend ways to strengthen and better coordinate them.</p>                                                                                                                                                                                                                                                                                       |                                       |

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| <b>Springer, Gary</b>                       | <b>Category: 3. General Comments Not Related to Specific Work Plan</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                           |
| <b>Issue:</b> 164                           | <b>Title:</b> Public Stature and Funding                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <b>Subject:</b> Education |
| <i>Description</i>                          | <p>#1 issue, near and long term - The Board must help the Department find ways to increase its political and public stature. We’ve seen an overall and steady decline in the Department’s ability to maintain its seat at the General Fund table over the past decade, through both economic downturns and improvements. In contrast to that, it should be noted that landowners have remained willing to pay their fair share of Fire and Private Forests Program support through both up and down times. This is a crisis in public funding, public understanding and public support for the Department of Forestry and its public benefit outputs and I think it is being reflected in budget decisions made in the Governor’s office and in the legislature. I have thought for some time that ODF needs to find a new public funding source for its programs. The General Fund well seems to be slowly running dry, when it comes to paying for natural resource programs in the whole and forestry programs specifically. But the problem is bigger than the loss of General Funds. I think it is a loss of public recognition, understanding and support for the ODF programs. If this problem can’t be solved the Forestry Program for Oregon will be a hollow promise, gathering dust on the shelf.</p> |                           |
| <i>Staff Comments by:</i><br>Agency Affairs | <p>This comment calls attention to limited public recognition and understanding of ODF programs, linking this to ongoing difficulties in securing General Fund support. Multiple factors may be at work here, including a generalized increase in competition for General Fund dollars, an urbanizing population, and a general public loss of connection with natural resource</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                           |



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issues (i.e. the "nature deficit disorder" described by Richard Louv and others). The comment highlights the challenge of maintaining statutory mandates, such as fire protection, while going beyond these to address the long-term future through education and other means. This is a worthy topic for Board discussion. In addition, at the staff level a department work group is seeking ways to strengthen and better coordinate outreach and education, in recognition of the importance of these activities to the department's long-term success.

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| <b>Springer, Gary</b>                      | <b>Category: 2. Addressed in Current Work Plan</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                         |
| <b>Issue:</b> 196                          | <b>Title:</b> Stable State Forests Mgt - Springer                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>Subject:</b> State Forests - General |
| <i>Description</i>                         | <p>State Forests Management – The Board needs to provide stability for the State Forests Program and for the managers of State Forests. The struggle over this planning model vs. that planning model and the desire for more and more information upon which to base decisions that never seem to come has gone on too long. The Board should set reasonable, achievable, balanced targets for economic, social and environmental outputs that will be less hated by the affected counties than by anyone else and then turn State Forest professionals free to go about attempting to achieve them....for some relatively long period of time. Future options will continue to exist under all of the management models the Board has seriously considered. Pick one and run with it for awhile. Changes can and will be made by future Boards, if they are called for. The unending debate over State Forests management is going to drive program employees to drink and then on to less stressful jobs somewhere else.</p> |                                         |
| <i>Staff Comments by:</i><br>State Forests | <p>This issue is less about a potential work plan issue than a comment on the process associated with WP 2, IBI6. The commenter encourages a decision about how to manage Board of Forestry lands be reached. The commenter also recognizes that future management adjustments will be made if warranted.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                         |

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| <b>Storm, Rex</b>                                     | <b>Category: 1b. New Topic: Incorporate Input Into Existing Work Plan</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                          |
| <b>Issue:</b> 39                                      | <b>Title:</b> Enhance Economic Resilience                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>Subject:</b> Maintain Working Forests |
| <i>Description</i>                                    | <p>Enhance Economic Resilience of Forest Protection Policies: ODF is facing some unusually severe economic challenges, which are expected to directly impact the state's private forest and fire protection programs and policies. As such, it would be timely for the Board to identify and address those top priorities--and the major efficiencies--for its own work and that of ODF. New issues are now front &amp; present for Oregon forest policy that are economically-driven, and these emergent issues necessarily must take urgent precedence over much of the past discretionary policy work of the Board and ODF.</p> <p>See PDF for remaining text.</p> |                                          |
| <i>Staff Comments by:</i><br>Forest Resource Planning | <p>The commenter raises several topics that surround encouraging greater private forestland investment. The Board has implemented the Private Forests and Forest Vitality Work Plans for this purpose. However, several specific new recommendations are provided that could be considered for addition to these and other Board Work Plans.</p>                                                                                                                                                                                                                                                                                                                      |                                          |



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| <b>Storm, Rex</b>                                     | <b>Category: 2. Addressed in Current Work Plan</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                    |
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| <b>Issue:</b> 40                                      | <b>Title:</b> Maintain Infra-Structure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>Subject:</b> Economic Framework |
| <i>Description</i>                                    | <p>Curb Forest Infrastructure Loss that Impairs Future Forest Sustainability:<br/>Especially in Eastern Oregon, but applicable to every Oregon region where federal forests exist, the collapse of the federal forest management has since 1990 been slowly eliminating the forest product manufacturing and forest contracting infrastructure. This is escalating into a crisis for Oregon forestry for five major reasons: 1) loss of mills &amp; contractors needed to manage all forests--public &amp; private; 2) investments in technology &amp; workforce fail to happen due to foregone economies of scale; 3) devaluation of private timber and forestland, such that private forestry is unprofitable; 4) lacking capability to manage unhealthy &amp; dangerous federal forests escalates all public costs--e.g. firefighting, water, recreation; and 5) many forest landscapes become uneconomical for forest land use--and are subject to conversion to non-forest uses.</p> <p>See PDF for remaining text.</p> |                                    |
| <i>Staff Comments by:</i><br>Forest Resource Planning | <p>The issues cited involve federal land management policy, health and resiliency of the forest cluster, and rapidly changing economies. ODF staff has been engaged with the Federal Forestlands Advisory Committee to work with constituent groups, policy makers and lawmakers to recommend changes in federal forest policies. Work is ongoing to craft and implement a new forest cluster economic development strategy in coordination with OECD, OSU and OFRI. Unresolved is how to address maintaining forest infrastructure with the economic volatility in Oregon's forest economy caused by the current economic downturn and the accelerating pace of change in global, national, state, and local economies. Along with this change are much more fluid labor, commodity, finished product, and capital markets. These issues continue to undermine the ability to maintain forest infrastructure and sustainability and limit contributions to local and state economies.</p>                                   |                                    |

| <b>Storm, Rex</b>                            | <b>Category: 1b. New Topic: Incorporate Input Into Existing Work Plan</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                          |
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| <b>Issue:</b> 41                             | <b>Title:</b> Keep Forests Working                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>Subject:</b> Forest Fragmentation and Working Forests |
| <i>Description</i>                           | <p>Promote Keeping Forestlands as Working Forests:<br/>The Board and ODF could do far more to promote policies that encourage "working forests" on both private and public ownerships in Oregon. Working forests provide important economic benefits that help maintain private forest ownerships against competing non-forest land uses. In recent years, conversion of forestlands to other land uses has increased, in-part because forest regulations incrementally have depreciated the value of growing and harvesting trees as a land use. Maintaining working forests over competing land uses also helps sustain a multitude of ecological benefits. Management to promote growing and utilizing renewable forest &amp; energy products is important to fulfill increasing human consumption needs.</p> <p>See PDF for remaining text.</p> |                                                          |
| <i>Staff Comments by:</i><br>Forest Resource | <p>The commenter emphasizes the importance of public and private working forests and provides specific actions that the Board and Department could take to further promote working forests. Since this topic is being addressed through the Forest Vitality Work Plan, this input may be</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                          |



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| Planning | useful in the next update of that Work Plan. |
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| <i>Storm, Rex</i>                                 | <i>Category: 1b. New Topic: Incorporate Input Into Existing Work Plan</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                |
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| <i>Issue:</i> 42                                  | <i>Title:</i> Reinvent Fire Protection Program                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <i>Subject:</i> Fire - Funding |
| <i>Description</i>                                | <p>Fire Protection Program Reinvention:<br/>           The Board should establish an initiative or strategy to promote fair and equitable forest protection funding at both the statutory and administrative levels. Each session of the Oregon Legislature involves attacks on the balance of fire protection share-costing between forest landowners and the public general fund. As the legislature attempts to reduce the general fund contribution, the actual forest firefighting costs attributable to public ignition sources are increasing. Consequently, the previous successful public-private relationship of cooperative stewardship for fire protection is now broken. And the current Legislature and Governor appear unwilling to help. The State of Oregon has reneged on paying its share of cooperative fore fire protection.</p> <p>See PDF for remaining text.</p> |                                |
| <i>Staff Comments by:</i><br>Protection from Fire | <p>This submission is requesting the establishment of an initiative to promote a balance of funding between landowners and the public general fund. In the Forestry Program for Oregon, Strategy "F", the Board promotes the "...shared public and landowner funding to maintain the most efficient level of fire protection...". This particular request would need to be addressed in the existing Work Plan 7: Wildfire Risk as a new Intermediate Board Issue.</p>                                                                                                                                                                                                                                                                                                                                                                                                                   |                                |

| <i>Storm, Rex</i>                                     | <i>Category: 2. Addressed in Current Work Plan</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                               |
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| <i>Issue:</i> 43                                      | <i>Title:</i> Address Unhealthy Conditions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <i>Subject:</i> Federal Lands |
| <i>Description</i>                                    | <p>Address Unhealthy Federal Forests Impacting Private Neighbors:<br/>           There is a clear and present danger in Oregon forests on a landscape scale, posed by unprecedented wildfire, insect, disease and storm damage hazards--increasing on federal forests &amp; rangelands. The vast scope of this problem has been recognized since the early 1990's by forest managers and scientists alike.</p> <p>See PDF for remaining text.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                  |                               |
| <i>Staff Comments by:</i><br>Forest Resource Planning | <p>The Federal Forestlands Advisory Committee (FFAC) identified the same issues raised in the comment (i.e., forest health, loss of infrastructure etc.). They also recognized that to move forward on solving these issues, and end the policy gridlock that has dominated federal lands for 20 years, will require taking a centrist approach. The FFAC – a very diverse set of stakeholders – felt that expanding the use of local collaborative processes to reach consensus on treatment methods was the most promising tool available to end the gridlock and move forward. The FFAC also advocated federal legislation, including a forest health bill and a sustainability bill, to help address these issues. ODF will move forward on these initiatives – recognizing that the State cannot dictate federal policy – in collaboration with other interested parties.</p> |                               |



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| <b>Storm, Rex</b>                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Category: 3. General Comments Not Related to Specific Work Plan</b> |
| <b>Issue: 44</b>                            | <b>Title: Build Stakeholder Coalitions</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <b>Subject: Board of Forestry</b>                                      |
| <i>Description</i>                          | <p>Building Effective Stakeholder Coalitions:<br/>           Building stronger coalitions and working relationships with ODF's key stakeholder community would provide much constructive and unique wisdom to forest policymaking. The Board politely hears public testimony concerning agenda items, but it rarely seeks the constructive input and advice from "key stakeholders" when evaluating forest issues and related policies. Although ODF actively interacts with some stakeholders, there are many forestry organizations and professionals who are not often counseled to provide their experience, insight or creativity surrounding the oft challenging policy matters confronting the Board and ODF. The result is missed opportunities to tape highly relevant and diverse expertise and experience.</p> <p>See PDF for remaining text.</p> |                                                                        |
| <i>Staff Comments by:</i><br>Agency Affairs | <p>This commenter suggests that the Board misses opportunities by not connecting with forestry organizations or professionals that could provide valuable input. Transparency and public participations are integral parts of the Board's vision and values, as expressed in the Forestry Program for Oregon. As it reviews its various work plans, the Board may wish to discuss and devote more attention to the information gathering and stakeholder involvement components of each.</p>                                                                                                                                                                                                                                                                                                                                                                 |                                                                        |

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| <b>Sunanda, Micheal</b>                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <b>Category: 3. General Comments Not Related to Specific Work Plan</b> |
| <b>Issue: 17</b>                            | <b>Title: Public Hearings on Logging Effects</b>                                                                                                                                                                                                                                                                                                                                                                                                                                         | <b>Subject: Board of Forestry</b>                                      |
| <i>Description</i>                          | <p>Please have public hearings for fair &amp; honest debates using current &amp; comprehensive forest ecology about how logging damages healthy native forest habitats by clear cutting &amp; tree farms.</p>                                                                                                                                                                                                                                                                            |                                                                        |
| <i>Staff Comments by:</i><br>Agency Affairs | <p>The comment reflects general concerns about logging, clearcutting, and effects on native forest habitats. As such, it could be seen as touching on aspects of many Board issues, including dynamic ecosystems, forest sustainability, the management and future of private forestlands, and the appropriate role of federal forestlands. The Board incorporates public input as part of its work, and receives comments reflecting a variety of scientific and policy viewpoints.</p> |                                                                        |

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| <b>Sunanda, Micheal</b>                      |                                                                                                                                                                                                                            | <b>Category: 3. General Comments Not Related to Specific Work Plan</b> |
| <b>Issue: 18</b>                             | <b>Title: Stop Clearcutting Large Trees</b>                                                                                                                                                                                | <b>Subject: Miscellaneous</b>                                          |
| <i>Description</i>                           | <p>Please stop clear cutting of old &amp; large 2nd growth forest tree destroys healthy native forest wildlife habitats vitality, fertility &amp; heats up our climate crisis by killing carbon sink forest functions.</p> |                                                                        |
| <i>Staff Comments by:</i><br>Private Forests | <p>See staff response, protect old forests, Issue Scan ID #60</p>                                                                                                                                                          |                                                                        |



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| <b>Sunanda, Micheal</b>                    |                                                                                                                                                                                                                                                        | <b>Category: 3. General Comments Not Related to Specific Work Plan</b> |
| <b>Issue:</b> 19                           | <b>Title:</b> Stop Log Exports                                                                                                                                                                                                                         | <b>Subject:</b> State Forests - Harvest                                |
| <b>Description</b>                         | Please stop exporting logs form Oregon forests.                                                                                                                                                                                                        |                                                                        |
| <b>Staff Comments by:</b><br>State Forests | Oregon Revised Statute 526.806 establish that it is "unlawful to export unprocessed timber originating from public lands in Oregon." Public lands include those lands "owned by the State of Oregon or by any other public subdivision" (ORS 526.801). |                                                                        |

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| <b>Sunanda, Micheal</b>                      |                                                                                                                                                                                                                      | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 21                             | <b>Title:</b> Stop Spraying and Drift                                                                                                                                                                                | <b>Subject:</b> Forest Practices - Pesticides      |
| <b>Description</b>                           | Please stop the poison spraying forests that drifts in air of people & into drinking water of people & animals, with well know harm, it appears forest industry has monopoly on spraying protected by OFD policies?! |                                                    |
| <b>Staff Comments by:</b><br>Private Forests | See staff response, General Concern about Pesticides, issue ID # 11<br>See staff response, Public Health, issue ID # 20                                                                                              |                                                    |

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| <b>Sundquist, John</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 174      | <b>Title:</b> Pesticide Dependency - Sundquist                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <b>Subject:</b> Forest Practices - Pesticides      |
| <b>Description</b>     | <p>I'm a Lane Co farmer and timberland owner. I supported bringing the issue of reckless and unnecessary pesticide use to the last BOF issues scan, and I attended several Board of Forestry meetings last year where pesticide use was discussed.</p> <p>I remember in particular a Salem meeting where ODF and ODA staff reported they didn't have enough data collected to form an opinion, and so concluded pesticides were suitable and safe. Staff then offered to do a literature search on damage from forest pesticides, and the board ordered future agenda items in work sessions on pesticide issues. To my knowledge, the literature search is not completed, and no BOF agenda items or work sessions on pesticide problems have occurred.</p> <p>At last summer's BOF meeting in Cottage Grove, most of the people submitting testimony spoke to personal and environmental injury caused by off-target drift of forest pesticides. Numerous studies have shown forest pesticide residue runoff pollutes downstream sediments, fish tissue and stream water, which is now a violation of the US Clean Water Act.</p> <p>The Board of Forestry must address the problems of excessive pesticide use not only because of these poisons drift off-target and cause documented harm to people, fish and the environment, but also because pesticides, like fuel and fertilizer, are fossil-fuel products and are therefore ultimately unsustainable.</p> <p>I urge the BOF to make the problems of pesticide dependency central to its 2009-2011 agenda.</p> |                                                    |



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| <i>Staff Comments by:</i> | See staff response, General Concern about Pesticides, issue ID # 11                              |
| Private Forests           | See staff response, Buffers for Pesticide Application, issue ID # 20                             |
|                           | See staff response, Pesticide Literature Review and Use of Best Available Science, issue ID # 22 |
|                           | See staff response, Pesticide Monitoring, issue ID # 23                                          |
|                           | See staff response, Public Health, issue ID # 20                                                 |

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| <b>Tucker, Clare</b>      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 185         | <b>Title:</b> Use Best Science - Tucker                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>Subject:</b> Forest Practices - Pesticides      |
| <i>Description</i>        | <p>This issue has been an issue for far too long. A public agency should be making decisions based on the best available science. There needs to be a transparent, independent, unbiased search of professional and credible research on forestry herbicides, their modes of transport through the environment, their effect on human health, on fish, and on the environment in general. Good policy is based on good science.</p> <p>Please, just do it.</p> |                                                    |
| <i>Staff Comments by:</i> | See staff response, General Concern about Pesticides, issue ID # 11                                                                                                                                                                                                                                                                                                                                                                                            |                                                    |
| Private Forests           | See staff response, Buffers for Pesticide Application, issue ID # 20                                                                                                                                                                                                                                                                                                                                                                                           |                                                    |
|                           | See staff response, Pesticide Literature Review and Use of Best Available Science, issue ID # 22                                                                                                                                                                                                                                                                                                                                                               |                                                    |
|                           | See staff response, Pesticide Monitoring, issue ID # 23                                                                                                                                                                                                                                                                                                                                                                                                        |                                                    |
|                           | See staff response, Public Health, issue ID # 20                                                                                                                                                                                                                                                                                                                                                                                                               |                                                    |

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| <b>Vaughn, Kyle</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 95    | <b>Title:</b> Pesticide Use - Vaughn                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>Subject:</b> Forest Practices - Pesticides      |
| <i>Description</i>  | <p>I have recently become aware of the negative effects that arial spraying has had on both the environment and ordinary citizens. It has become extremely apparent that the lack of a buffer zone has been the cause of many of my peers to become ill. Most people know that a herbicide or pesticide is a poisen, which effects all different forms of living organisms. Because of this, buffer zones should be installed so that the harmful chemicals that are the basis of these pesticides cannot come in contact with human life and the ecosystem, such as rivers and streams. Being a person who lives in a forested, rural area, I am very concerned with the ability timber corporations have to spray pesticides directly above my home. I believe the best solution to this problem would be to end all aerial spraying, and limit only to ground spraying. However, I am aware this is a very unlikely as it will require much more money and resources - that being said, the best possible solution to this problem would be to create buffer zones that</p> |                                                    |



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|                       | protect homes, rivers, and streams. Thank you.                       |
| <i>Staff Comments</i> | See staff response, Buffers for Pesticide Application, issue ID # 20 |
| by:                   | See staff response, Public Health, issue ID # 20                     |
| Private Forests       |                                                                      |

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| <b>Vickerman, Sara</b>                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>Category:</b> 1c. New Topic: Additional Staff Work- Possible Board Action |
| <b>Issue:</b> 189                                        | <b>Title:</b> Conserve Ecosystem Values                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <b>Subject:</b> General Forest Policy                                        |
| <i>Description</i>                                       | <p>Strategy E of the Forestry Plan for Oregon is to “Contribute to the conservation of diverse native plant and animal populations and their habitats in Oregon’s forests,” and Action E2 encourages pursuit of a coordinated statewide conservation policy. However, the Department of Forestry did not fully take advantage of the opportunity to engage in the development of Oregon’s wildlife conservation strategy, led by the Department of Wildlife. The Forest Practices Rules continue to address wildlife conservation more as a constraint than as an objective and do so in a very incomplete and fragmented way by dealing with very limited habitat elements, a limited number of special resource sites and listed species.</p> <p>In order to better implement Strategy E, the Board and Department should pursue opportunities to more fully engage with implementation of the State Wildlife Action Plan, both to more effectively implement a strategic approach to wildlife conservation on forest lands and to gain experience that will help them more effectively engage in revision of action plan in 2011</p> <p>A more effective and comprehensive approach to the conservation of diverse plant and animal populations and their habitats in Oregon's forests will require greater attention to the development and implementation of policies that either require, reward, or inspire landowners to address biodiversity issues beyond water quality, fish, special resource sites and listed species. There are several incentive programs and tools that are available but under-utilized and largely unfunded, including conservation easements, stewardship agreements, wildlife habitat conservation and management plans and Forest Legacy and others. There are also opportunities to develop programs that assist landowners in securing payments for ecosystem services, as specified in HB 2293 relating to the expansion of the Oregon Forest Resource Trust.</p> |                                                                              |
| <i>Staff Comments</i><br>by:<br>Forest Resource Planning | <p>The Oregon Wildlife Conservation Strategy was developed to inform landowners about voluntary wildlife habitat protection priorities. ODF participated in review of the strategy developed by ODFW. The Conservation Strategy priorities will be useful as ODF prepares a statewide forest assessment called for by the 2008 Farm Bill. The Board has not been successful to date in gaining broader state government support for development of a coordinated, statewide Oregon native plant and animal conservation policy addressing all land uses and ownership classes. In the Board's view, this adopted policy should:</p> <ul style="list-style-type: none"> <li>-- Recognize that the primary purpose of most private forestland is to grow and harvest commercial tree species.</li> <li>-- Clearly consider public expectations for the contributions of private landowners on all uses to achieve state goals and how, in light of the technical assessment results, those expectations can be met in a fair and equitable manner.</li> <li>-- Ensure that any additional contributions by private forest landowners are sought first through non-regulatory methods and only through regulation if the assessment shows a clear, compelling need.</li> </ul> <p>The Board may wish to focus on this topic as a new Work Plan.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                              |



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| <b>Wilson, James</b>      |                                                                                     | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 81          | <b>Title:</b> Pesticide Use - Wilson                                                | <b>Subject:</b> Forest Practices - Pesticides      |
| <i>Description</i>        | We need a buffer zone to stop spraying pesticide near homes, schools, & watersheds. |                                                    |
| <i>Staff Comments by:</i> | See staff response, Buffers for Pesticide Application, issue ID # 20                |                                                    |
| Private Forests           |                                                                                     |                                                    |

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| <b>Wilson, James</b>      |                                                                                | <b>Category: 4a. Outside Board Purview</b> |
| <b>Issue:</b> 82          | <b>Title:</b> BOF Conflict of Interest - Wilson                                | <b>Subject:</b> Board of Forestry          |
| <i>Description</i>        | BOF members should not have a conflict of interest. No revolving door members. |                                            |
| <i>Staff Comments by:</i> | Please refer to issue 16                                                       |                                            |
| Agency Affairs            |                                                                                |                                            |

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| <b>Wilson, Laurie</b>     |                                                                      | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 49          | <b>Title:</b> Pesticide Use - Wilson                                 | <b>Subject:</b> Forest Practices - Pesticides      |
| <i>Description</i>        | We need a buffer zone to stop spraying pesticide near homes.         |                                                    |
| <i>Staff Comments by:</i> | See staff response, Buffers for Pesticide Application, issue ID # 20 |                                                    |
| Private Forests           |                                                                      |                                                    |

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| <b>Wilson, Laurie</b>     |                                                             | <b>Category: 4a. Outside Board Purview</b> |
| <b>Issue:</b> 50          | <b>Title:</b> BOF Conflict of Interest - Wilson             | <b>Subject:</b> Board of Forestry          |
| <i>Description</i>        | BOF members should not have financial conflict of interest. |                                            |
| <i>Staff Comments by:</i> | Please refer to issue 16                                    |                                            |
| Agency Affairs            |                                                             |                                            |

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| <b>Workman, Justin</b> |                                                                         | <b>Category: 2. Addressed in Current Work Plan</b> |
| <b>Issue:</b> 101      | <b>Title:</b> Pesticide Use - Workman                                   | <b>Subject:</b> Forest Practices - Pesticides      |
| <i>Description</i>     | We need a buffer zone to stop spraying pesticides near homes & schools. |                                                    |



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|                                                 | Please address the use of multiple pesticides used a the same time, on the environment. |
| <i>Staff Comments</i><br>by:<br>Private Forests | See staff response, Buffers for Pesticide Application, issue ID # 20                    |

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| <b>Workman, Justin</b>                         | <b>Category:</b> 4a. Outside Board Purview                                         |                                   |
| <b>Issue:</b> 102                              | <b>Title:</b> BOF Conflict of Interest - Workman                                   | <b>Subject:</b> Board of Forestry |
| <i>Description</i>                             | Oregon Board of Forestry members should not have a financial conflict of interest. |                                   |
| <i>Staff Comments</i><br>by:<br>Agency Affairs | Please refer to issue 16                                                           |                                   |

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| <b>Workman, Justin</b>                          | <b>Category:</b> 1b. New Topic: Incorporate Input Into Existing Work Plan          |                                            |
| <b>Issue:</b> 103                               | <b>Title:</b> Diverse Forests - Workman                                            | <b>Subject:</b> Forest Practices - General |
| <i>Description</i>                              | Please replant native diverse forest when replanting.                              |                                            |
| <i>Staff Comments</i><br>by:<br>Private Forests | See staff response, Diverse forests, native plants; no monocultures, Issue ID # 59 |                                            |