

Statement to the Board of Forestry

March 5th 2003

Forest Program for Oregon, It's about time to talk sustainability.

OSWA supports the Oregon Board of Forestry and Oregon Department of Forestry (ODF) in their current overall approach to updating the Forest Program for Oregon. OSWA believes it is time to overcome the differences that take us to court in conflicts over micromanagement of forests. Time to overcome the assumption that forests have all the answers and that by regulating forestry we can solve all the sustainable development issues. It's time to offer family forestland owner's certainty that their private property rights will be protected so by increasing incentive to own forestland over the long term. It is time to focus our efforts on achieving sustainability across a number of arenas of society, to develop strategies for a number of state agencies aimed at providing long term economic cornerstones upon which families can sustain their forestlands over generations and allows them to manage for a variety of objectives including fish and wildlife habitats, clean water and catastrophic wildfire prevention. The public appear to love wood products. Despite this love of wood, the public hate to see local trees harvested and the area replanted as required by Oregon law. The products are therefore increasingly shipped from abroad with non guarantee of the standards to which they were managed and at great life cycle energy cost. It is time to address this ambivalent, not in my back yard, attitude by having an open discussion on sustainability. We need to get over the illusion that by not cutting trees in Oregon or using substitute products we can achieve economic, social and environmental sustainability both here and globally. It is time to actively promote Oregon's forests, the people who and standards by which they are managed, and the products they produce as sustainable and world class. OSWA believes the Board's approach to updating FPFO will help us achieve these goals.

OSWA supports the use of international criterion and indicators to organize data and promote discussion about how forests may be managed sustainably.

OSWA welcomes the challenge of being compared to other areas of society and regions of the world to determine how we rank in terms of common sustainability indicators. It is becoming increasingly difficult to persuade the next generation to accept the legal complexities and economic risks of owning forestland in Oregon. We urge the Board to

put a high priority on providing a climate that encourages personal investment and ownership of family forestlands. This means, among other things, keeping the process as simple as possible at local level. It also means keeping the focus on assessing sustainability at state level, staying true to the spirit of the Montréal Process that states the criterion and indicators should be monitored at the national or international level. We also suggest that if ODF, the Board and Oregonians are to place the time and effort into development of the FPFO, we need to have a tangible result in local and international markets. We suggest the FPFO indicator approach should be used over time to achieve mutual recognition between Oregon land use, labor and forest practices regulations, and third party certification schemes. Many family forestland owners of less than 5000 acres find certification to be an expensive burden and have less economic incentive to be certified due to scale issues. For those who say this would mean succumbing to business as usual forestry, OSWA would say great. Business as usual forestry in Oregon is practiced under some of the most unique and stringent legal standards in the world. When the Forest Stewardship Council, an international certification scheme, ratified the UK Woodland Assurance Scheme based upon legal standards, they did so realizing that business as usual in many countries is practiced at high levels. If the regulatory bar is raised in these regions, we force supply pressures to move to areas of the world with limited laws and enforceable regulations. We need to get over the illusion that by not cutting trees in Oregon we can achieve sustainability both here and globally. We would ask the board to push for completion of a study led by OSU that investigates the common ground between the Sustainable Forest Initiative, FSC and Oregon Forest Practices Act standards.

OSWA supports the Forest Plan for Oregon public comments period for its potential to increase public understanding of all sustainability issues in Oregon

Increasingly, forests owners have been asked to bear the burden of solving a number of interdisciplinary sustainability issues. For example: population growth, natural resources consumption rates, water quality and quantity, and climate changes. We can be part of a solution. To help develop that solution all Oregonians should be provided with holistic, credible information that allows them to make wise consumer and political decisions and understand how those decisions regarding forests and forestry here in Oregon fit within a global sustainability context. With population increases here and abroad, with the USA importing as much as one-third of its wood needs and with our dependence on foreign

oil under scrutiny, it may be time to look at the life cycle assessment, political and social costs of imports and substitute oil base products that now compete against local wood. OSWA is concerned that public comments may lead to a document based on special interest group's issues as opposed to the best available peer-reviewed science. OSWA is glad to see that on page 9, lines 2-6 the Board clearly states the FPFO is not a legally binding instrument, and "does not impose mandatory requirements or standards on the board, the Department of Forestry, or forest landowners". OSWA suggests the Board retain the right to review the public comments and blend those comments with the best available peer reviewed science to base its strategies for the FPFO. OSWA recommends the Board clarify the aims of the biodiversity plan to ensure sustainability.

We need a holistic investigation to determine if our approaches to forest management are truly sustainable. These investigations need to be based on actual consumption patterns and behaviors rather than public opinion that so often drives policy and regulation. We have concerns with the aim and implications of developing a biodiversity plan addressing all ownerships with specific targets and actions within FPFO. We ask that ODF staff work to ensure clarification on this issue before any plan is adopted.

Our concern is centered on four issues

1. The idea that we can at present develop a plan addressing all ownerships and land uses with specific targets and actions based on sound science.

If it means that that all Oregon landowners should try to achieve direct biodiversity and individual species protection objectives on their land, we propose this would have detrimental effects upon biodiversity both here and abroad. Owning forestland in Oregon is increasingly expensive for families and increasingly risky due to societal expectations of our ability to answer all their sustainability needs. We are often forced to sell or convert land into other uses, losing both local supply capacity and ecosystem habitats. We would, however, welcome a plan that, by addressing all ownerships with specific targets and actions, aims to investigate a sustainable illusion across all lands in Oregon (i.e., that by "protecting" politically sensitive forestlands in Oregon for specific flora and fauna we are helping to achieve global or local biodiversity)

2. Any Biodiversity Plan is based on sound science.

The National Commission on Science for Sustainable Forestry (NCSSF) is already trying to identify core Montréal Process biodiversity indicators to apply to sustainable forestry. The Commission is a blue ribbon group of leading scientists, forest managers and policy makers from government, industry and environmental organizations. "Gaps in scientific understanding hamper the design, conduct, and evaluation of sustainable practices in forestry," said Dr. John Gordon, Commission Chair. "Our number one charge is to conduct the highest priority, objective non-advocacy research on biodiversity and sustainable forestry that is most relevant to improving management practices in the next five years."

In a paper presented by NCSSF in Portland, Oregon on June 20, 2002, it was suggested that the advancement of sustainable forestry and biodiversity conservation is limited by: a) crucial gaps in scientific understanding; b) insufficient transformation of research results into usable information; c) lack of tools to measure and evaluate progress; and d) inadequate communication between researchers and practitioners.

Based on this evidence, OSWA suggests that the Board and ODF continue to consult with the NCSSF on how to assess biodiversity at state level before a biodiversity plan with specific targets and actions is further developed.

3. The assumption we can save everything in a dynamic system.

OSWA would disagree with the assumption stated in Oregon's First Approximation Report, upon which the FPFO is based, that the ultimate goal of conserving biological diversity in Oregon's forests is to ensure the long-term survival of all plant and animal species and the genetic variability within those species. Oregon's forest habitats are a dynamic system that over millennium have seen mass extinctions due to a variety of non-human related causes such as glaciations and volcanic activity. To assume we can ensure the long-term survival of all plant and animal species is unrealistic.

Nowhere in Montreal Process Criterion 1: Conservation of Biological Diversity, does the text suggest that actions can be taken to protect all species over time.

We recommend that clarification be made in the FPFO and any future Approximation Report on these issue. In particular, we would like to see that the Potential indicators to measure progress towards protecting, maintaining, and restoring diverse native plant and animal populations and their habitats in Oregon's forests recognize that all natural systems are dynamic and that indicator number 4 Status and population levels of rare, sensitive, threatened, or endangered native plants and animals takes the Montréal philosophy of levels of biodiversity as opposed to individual species protection to in to consideration.

4. Breaking what is potentially a big biodiversity asset, diversity in ownership.

OSWA members often manage for wildlife habitats. We are able to blend this desire with our economic and social objectives, despite increasingly restrictive and single species focused regulations. We want to see our forests continue to provide homes to a wide variety of species. But we must have an economic cornerstone, private property rights and some form of regulatory certainty upon which to build. In particular OSWA is concerned that if private property rights are further restricted by new regulations that filter down from the 2003 FPFO based upon a biodiversity plan, it will be increasingly uneconomical and impractical for family forestland owners to retain their land in forest cover. This could have a detrimental affect on biodiversity in our state. A 2002 report by OSU researchers suggested a variety of ownership types are associated with a variety of habitats. The Board recognizes that different landowners play multiple roles and the Board supports this diversity of ownership. It does not make good social, economical, or environmental sense to monopolize an ownership type, due to the current inability to assess biodiversity. We are currently seeing family forestland being converted to other uses at over 20,000 acres per year. New considerations of sustainability, biological diversity, international standards and criteria introduced in this 2003 version, will only intensify this problem if focused at local level. OSWA recommends the biodiversity plan help family forestland owners receive public credit and economic incentives for retaining lands in forest cover and for managing for a variety of objectives including timber production over time, as they can both directly and indirectly aid biodiversity. Time is running out for Family Forestlands in Oregon to help with sustainability.

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