

Date: March 30, 2017  
To: House Agriculture & Natural Resources Committee  
From: The Association of Oregon Counties  
Subject: House Bill 3226

Please add to the records of the House Agriculture & Natural Resources Committee these comments related to House Bill 3226, which is on the committee's agenda for public hearing on March 30, 2017.

### **AOC strongly opposes House Bill 3226**

The Association of Oregon Counties believes that different ownerships of forestlands serve different purposes within Oregon, each type of forestland having its place of value to the state. HB 3226 would seek to change the purpose and character of privately owned forestlands operating productively and responsibly under the Oregon Forest Practices Act. The bill is badly misguided. Standards under the FPA should be improved after careful study and consideration, as they are currently under the Board of Forestry procedures, not by ham-handed legislative fiat.

The bill, proposed by Pacific Rivers and Center for Sustainable Economy, would:

- Require the Board of Forestry to establish criteria for preserving natural resources values on forestland.
- Require a detailed forest management plan for owners or operators of forestland of 5,000 or more acres, which includes provisions to establish late successional and old-growth forest areas and requires approval by the State Forester.
- Require a timber harvest plan before beginning a harvest operation.
- Establish riparian management area requirements, where forest operations are prohibited or limited.
- Impose criteria for forest roads and preparation of a road plan for roads on other lands necessary to make timber harvest practicable.
- Restrict harvest and road construction in areas of landslide risk.
- Allow a local government to impose public trust resource protections that exceed state protections on forestland.
- Change the geographic basis of Board of Forestry standards related to forest practices, and expand the list of resources to be maintained and inventoried under the standards.

These requirements are too much all at once and in the wrong forum.

AOC respectfully requests the Committee to let the bill die where it is.