

August 21, 2022

To Oregon Board of Forestry
Board Support Office
2600 State Street
Salem, OR 97310

From: David & Mary Ann Bugni
30265 SE Kowall Rd.
Estacada, OR 97023

Re: **Support for the Private Forest Accord and a description of its impact on our family**

Dear Board,

We support the Private Forest Accord (PFA) and are providing some specific details about how the riparian-related sections of these proposed rules will affect our family forest. We request that this information be entered into the public record on this matter.

First, some background about our family: we own 83 acres of forestland in the unincorporated Estacada area, and we are fortunate to have been honored as the 2021 State of Oregon Tree Farmers of the Year as well as the 2019 winner of the joint Dept. of Forestry and Dept. of Fish & Wildlife “Fish and Wildlife Steward Award – Forestlands, Northwest Oregon Region.” David is currently the in-coming Board Chair of the Clackamas River Basin Council and is the Secretary/Treasurer of the Clackamas County Farm Forestry Association. David is also a member of the committee that has been tasked with assisting ODF in drafting the riparian-related rules of the PFA and is thus familiar with its intent.

About 0.8 miles of Suter Creek (a medium, type SSBT stream) flows through our property. Through our family’s fish habitat restoration work over the years, this creek is once again quite a productive coho and winter steelhead stream. This creek length, in combination with the number of perennial, type N streams that flow into it, results in a significant impact to our family’s timber revenue-related finances when one overlays the riparian requirements of the PFA. Specifically, under the Small Forestland Owner (SFO) no-cut RMA option, at least 25 acres, or 30% of our property will be off limits to logging. Should we choose to adopt the Standard Practice RMA Option (the option required for industrial forestland owners), that percentage increases to over 37%. We understand the need for these riparian management requirements to improve stream temperatures and water quality as well as improve physical habitats for aquatic life and amphibians, but we want the Board to know that it comes at a tremendous cost to small forestland owners who own land with streams that are affected by these proposed rules. We are also aware of the work to minimize the economic impact of these requirements on the SFO and we greatly appreciate such efforts. For some, like us, we are willing to bear these costs; for others, this cost may be too great to bear, and we hope those woodland owners do not convert their forestland to other uses to avoid this significantly negative revenue impact. We also hope that the public will come to realize the cost that the PFA will impose on all small woodland owners who are affected, as such sacrifices by all of us will ultimately benefit the public and the State of Oregon.

In summary, while we support the intent of the PFA current language, it comes at a tremendous cost for those of us who own forestland with flowing waters, and we are counting on ODF to craft the final rules fairly and thoughtfully, and to thoroughly support and assist small forestland owners to understand and comply with the new rules.

Thank you.

Sincerely,

David and Mary Ann Bugni