



Providing Opportunity to Family Forestland Owners

June 19, 2014

Public Testimony to Environmental Quality Commission

Chair O’Keeffe, members of the EQC, and Director Pederson

My name is Jim James, Executive Director of the Oregon Small Woodlands Association (OSWA). I would like to start by thanking the EQC and DEQ for scheduling a presentation by the Watershed Research Cooperative this afternoon. As you know from OSWA testimony on March 20th and from letters to you from OSWA, family forest owners in Oregon have a major concern about the rulemaking process being done by the Board of Forestry because we believe the new Paired Watershed studies demonstrate that no changes are justified. As you know, the Protecting Cold Water criteria, developed by the EQC some time ago, is at the center of this debate. I hope you will all agree that science needs to be the driver when developing public policy, particularly when there are big potential economic impacts to landowners by poor public policy.

OSWA does not oppose regulation when it is driven by science and is based on a common sense balance of cost and benefits. That is why the Watershed Research Cooperative research is so important. It is our opinion that science now supports more moderate Protecting Cold Water criteria than the current standard. One should not ignore the evidence that minor human caused stream temperature increases, when below the numeric criteria, pose no harm to fish. In fact there is evidence that minor and temporary increases in temperature can actually be beneficial to fish. It is our opinion that the guidance provided to the EQC, when the existing PCW criterion was developed, is now in question. The potential economic loss to forest owners and the rural communities in Oregon who rely on timber harvest for jobs and a way of life are at stake. It is our hopes that the EQC will recognize this problem and work to solve it.

It is our hope that once you are aware of the Watershed Research Cooperative studies and the DEQ’s historical approach to regulating water temperatures it will be clear there are questions about the current Protecting Cold Water criteria. There is too much at stake to ignore this new research.

Thank you for the opportunity to testify and thanks again for your attention to this issue.