



Providing Opportunity to Family Forestland Owners

Testimony of Jim James to Board of Forestry
March 4, 2014

My name is Jim James, Executive Director of Oregon Small Woodland Association. I am here again to comment on the rule making process the Board approved at the November Board of Forestry meeting. These comments are in addition to the comments made on January 8th. I would like to start by stating OSWA strongly supports Oregon's Forest Practice Act and appreciates that these laws are based on the best available science. I would also like to repeat that while OSWA has been communicating with the Department of Forestry, the Regional Forest Practices Committees, and concerned family forest owners we continue to believe there is no urgency to develop new rules for small and medium fish bearing streams. Please take the time needed to review all the science to inform you about appropriate board actions.

OSWA does acknowledge the Ripstream study as good science in measuring stream temperatures under the constraints of the study. However, there is an abundance of science that temperature increases resulting from standard forest practices are temporary and that some increases can actually provide benefits to the beneficial uses of forest streams. One should not forget, the current riparian protection rules are designed to provide many benefits to fish species including growing large trees in the riparian area as future large woody debris (LWD) which can be improved when some trees are removed.

Family forest owners already make a huge investment in protecting public resources. OSWA will provide the Board with a calculated estimate of the cost to family forest owners with any proposed additional regulations. Conservatively, an additional 1% take of the 4,668,000 acres of family forest land in Oregon would reduce the value of those acres by hundreds of millions of dollars. A hefty price tag for something that science tells us has little or no impact on the beneficial use of water in forest streams. Through regulation, please do not confiscate private property and reduce future productivity just because a decade old state cold water standard was developed without the current scientific knowledge about fish in forest streams.

Forest landowners in Oregon have a history of doing the right thing. We support healthy riparian areas and quality fish habitat. If there were sound science that suggests a problem for fish, I believe forest owners would support management tools using common sense to achieve the desired conditions. If landowners are not convinced that there is a problem that needs fixed, support for changes to existing riparian rules that diminish their investments will be a challenge.

Thank you for the opportunity to share OSWA's thoughts and concerns.