



Providing Opportunity to Family Forestland Owners

Jim James testimony Board of Forestry and EQC - November 5, 2014

My name is Jim James, Executive Director of the Oregon Small Woodlands Association (OSWA). OSWA represents the interests of the 140,000 family forest owners in Oregon.

Several of you will have heard this testimony before, but not all Board of Forestry members were present when John Westall testified on July 25th about the research he did in trying to understand the scientific basis behind the Protecting Cold Water criteria and I think his message is worth repeating. John is a retired Chemistry Professor at Oregon State University and a member of OSWA's Benton County chapter. He reviewed all the guidance provided to the EQC in developing the Protecting Cold Water criteria, the scientific information they provided to support their guidance, and the process the Environmental Quality Commission went through when developing the PCW criteria.

John's conclusions are very simple.

- He found no evidence that the federal government provided any scientific information to support their guidance to the Environmental Quality Commission to select a "no man caused temperature increase" for the Protecting Cold Water criteria
- Nowhere in the process was any scientific information provided that would suggest a minor and temporary increase in temperature in forest streams, following a timber harvest using Oregon's forest practice rules, would cause any harm to any fish species.

One can conclude the current Protecting Cold Water criteria is purely a policy decision not driven by any scientific information, particularly when used on forest streams.

The Board of Forestry is being asked to use the best available science to solve a problem based on what OSWA believes is a misguided policy call. The focus on short term, minimal changes in temperature may have unintended consequences to the productivity of fish and to landowners. The food chain needs to be considered as well as light and heat as an integral part of any riparian system. OSWA does not believe there is a temperature problem resulting from current forest practices. We recommend that the Regional Forest Practices Committees and anyone else involved in the policy decision be brought up to speed on the tradeoffs associated with temperature, shade and productivity from studies conducted over the last few decades and that it becomes part of the policy making process. OSWA's greatest fear is that for no fault of our own, family forest owners will be asked to make a huge economic contribution to solve a non-existing problem. Please do not allow such a calamity to happen.