

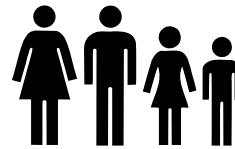
Committee for Family Forestlands

2600 State Street

Salem, OR 97310

503-945-7472

Fax 503-945-7490



TO: John Blackwell, Chair Oregon Board of Forestry
Marvin Brown, State Forester

DATE: January 12, 2010

FROM: Committee for Family Forestlands

RE: Oregon Family Forestlands and the DEQ Water Quality Standards
Review of Toxic Pollutants Criteria for the Protection of Human Health

As a standing advisory committee commissioned by the Oregon legislature, the Committee for Family Forestlands* (CFF) wants to express its concerns about the current efforts of the Department of Environmental Quality (DEQ) to address non point source water pollution.

The CFF understands the importance of water quality in Oregon and the vital role of forests as a source of high quality water. There is a positive relationship between forested lands and higher water quality, as is shown by the Oregon State of the Environment Report 2000. Because family forestlands are often located in or near urban interface areas and in transition zones where streams leave the forested landscape and move onto agricultural, urban and industrial land uses, we see the effects first-hand of different management strategies on water quality and supply. The CFF supports Board of Forestry and Department of Forestry efforts to maintain clean water, healthy rivers and functioning watersheds through both forest practices regulation and voluntary action.

Our committee is ready to help identify and solve real problems associated with non point source water pollution and to help construct an associated effective toxic reduction strategy. We, as representatives of family forestland owners, are willing to do our part to respond to emerging problems in water quality. This willingness gives rise to our first concern.

We are troubled by a DEQ process that has to date been very urban centered. In some ways, this urban focus is appropriate as many of the sources of water quality problems are ultimately related to urbanization and urban processes. We are in favor of a more collaborative policymaking approach that identifies and reflects a range of perspectives, land uses and ecosystems that will be critical to understanding the range of problems and creating effective solutions. The current policy discussion needs to be expanded to those managing the extensive landscapes of forest and grasslands in exurban and rural areas, across multiple land uses. Beyond this, federal lands also need to be included because federal forestlands comprise 60% of Oregon's forested landscape and

are typically found in higher elevations with higher rates of deposition and a strong influence on total water volume.

We have other specific concerns with DEQ's process including:

- The path forward must preserve the nexus between the Environmental Quality Commission and the Board of Forestry to meet statutory obligations related to the regulation of non-federal forestlands. The Oregon Forest Practices Act addresses water quality issues related to forestry. The Oregon Board of Forestry is the appropriate place to address issues related to non-federal forestlands following the well established procedures agreed to by ODF and DEQ.
- We would point out that the current public policy direction in Oregon is to seek non-regulatory solutions to environmental problems before adding new regulation. The Board of Forestry has reiterated its support for this policy approach. The CFF is concerned about a process that may bypass BOF authority and lead to an outcome adverse to family forestlands and their owners without effectively addressing the DEQ non point source water quality concerns. Forestland owners have been responsive to water quality issues as demonstrated by recent changes in Best Management Practices (BMPs) for roads and stream crossings and the significant voluntary efforts by forestland owners as a part of Oregon's Strategy for Salmon and Watersheds.
- The policy discourse must be centered in science – especially as the discussion of non point source pollution necessarily engages questions associated with global depositions, natural disturbance processes, and bio-accumulation in aquatic systems and expands the discussion to the function of riparian systems. To be effective, policy discussions must reflect good science well related to the empirical settings for which policy is considered. As an example, earlier water quality discussions in the Tualatin Basin assigned influences to forestlands that subsequent research demonstrated to be inaccurate. Water quality problems currently attributed to mercury and pesticide inputs are significant. Answers to this challenge must reflect good science in identifying the sources, framing the problems, finding solutions that work now, and building toward a long-term policy strategy to deal with related issues.
- Finally, any solutions must include a goal of keeping forestland in forest use. Because of the positive contribution of forests to over all water quality, river health and watershed function, the highest concern we have is that policy solutions to non point source pollution contribute to the likelihood that forestlands remain in forests, or at the least do not result in a new disincentive to own forestland.

In summary, we encourage the Board and Department to be engaged in this important policy issue in ways that not only help answer water quality questions, but also further the ability of forestland owners to keep their lands in forest use. We are aware of the limits of capacity and expertise in the

ODF Private Forests Program resulting from recent budget reductions and the challenge this presents. We would like to thank Marganne Allen and Jim Paul for their good work in engaging the DEQ on this issue and for meeting with the CFF to answer our questions. However, this is an area of high importance and impact to all Oregonians with particular impacts potentially falling to family forestland owners and deserves BOF and ODF priority.

We ask that the Board of Forestry direct the State Forester and his staff to bring our concerns to the Department of Environmental Quality and in particular underscore the historic nexus between DEQ and ODF in regard to implementing policy related to water quality on Oregon's forestlands.

Sincerely,

Committee for Family Forestlands



Craig Shinn, Chair



Gary Springer, Vice-Chair

cc: Oregon Board of Forestry Members
Marvin Brown, State Forester
Jim Paul, Private Forests Division Chief

*The Committee for Family Forestlands was established by the Oregon Legislature to advise the State Forester and the Oregon Board of Forestry on issues of importance to family forestland owners -- some 40,000 Oregonians, each managing between 10 and 5,000 acres of Oregon forestland. Our committee is made up of family forestland owners from different areas of the state, environmental organization and forest industry representatives, a citizen-at-large and ex-officio members representing the Department of Forestry, OSU Extension Service, Oregon Forest Resources Institute and logging or forestry consulting interests.