



Providing Opportunity to Family Forestland Owners

July 23, 2015

To: Board of Forestry

From: **Scott Hanson**, President, Oregon Small Woodlands Association

Re: Riparian Rulemaking Process

Today the Board has heard testimony from OSWA members. They focused on 9 points:

1. PCW has no credible scientific evidence to justify a 0.3 degree C threshold - The Board has some discretion in their decision making and does not need to lock up some of Oregon's most productive forestland to address a purely nonscientific policy call.
2. Minor temporary stream temperature changes cause no harm to fish - The Department's apparent desire for very large stream buffer options are clearly overreach and unwarranted.
3. Science clearly demonstrates how to protect all beneficial uses in forest streams
4. Models and the assumptions created from RipStream measurements are fundamentally flawed
5. Economic impacts to family woodland owners are huge and not proportional to any hypothetical benefit.
6. Extreme economic takings will affect many family woodland owners
7. Regional Forest Practices Committee recommendations are supported by OSWA. They provide the Board with an efficient and reasonable path. Their straight-forward site evaluation technique will have an impact on stream temperatures.
8. Rules must be the least burdensome to landowners
9. WA and CA riparian rules have problems & Coho returns in Oregon, Washington and California are essentially the same

These nine points must be factors when the Board approves a riparian rule, to the maximum extent practicable that addresses stream temperatures but does not ask forest landowners to shoulder enormous costs with absolutely no identifiable benefit to the resource. Take a good look at all the science. Do not let a poor public policy trump science and common sense. It is time for common sense in Oregon.

Thank you for considering OSWA's position.

Oregon Small Woodlands Association 187 High Street NE, Suite 208, Salem, OR 97301
Phone: 503.588.1813 - Fax: 503.588.1970 – Web: www.oswa.org