

July 23, 2015

Chair Imeson, Members of the Board,

For the record, my name is Heath Curtiss, and I'm here on behalf of the Oregon Forest Industries Council. I've appeared before you many times, and you know where we sit on this issue. The Forest Practices Act prohibits you from considering a water quality standard in isolation. Rather, you're to look at issues such as this more holistically. As we stated in our April proposal, bearing in mind the "overall maintenance" of resources, and the negligible impacts to the beneficial use, we strongly believe that you should take a very measured and incremental approach to the temperature exceedances evidenced by RipStream. Let's not forget that, on average, the post-harvest temperatures on private sites in RipStream were nearly 2 degrees below the relevant biologically base numeric criteria. RipStream evidences that, even on industrial timberlands, these are already very cold waters, well within the thermal optima for anadromous fish. RipStream is a success story. It is not a prompt for draconian new harvest restrictions.

But, I'm not here today to rehash all of that. Instead, I'd like to leave you with a couple supplemental notes, with a promise of further follow-up to the extent you're interested:

First, I'd commend ODF's work on its financial impact analysis. As you can see, new buffers threaten significant costs to landowners. A 70' no-cut buffer on only SSBT streams would cost landowners well in excess of \$100MM. But even that may not capture the true cost. Putting aside additional management costs associated with new rules, ODF assumes an even distribution of timber age classes on private lands in western Oregon. We believe this is wrong. Data from the Landscape Ecology, Modeling, Mapping and Analysis team, including collaborators from USDA, the PNW Research Station, and Oregon State University, indicate that standing private timber is skewed significantly toward *older* age classes. For private industrial lands, we calculate that the per-acre values may be 50-120% higher than represented in ODF's matrix. I've attached to my testimony graphics and a table prepared by Mason, Bruce & Girard showing the math.

Second, as OFIC testified in Sunriver, even when instructed to harvest to the FPA minimums, landowners left significantly more basal area on average. I've also attached to my testimony a graph prepared with the help of ODF showing the average delta. Private landowners left, on average, an additional 73 square feet of basal area per 500' of stream. Put another way, landowners left, on average, an additional 52 16" trees per 500 feet. The state also left significantly more than required by the Northwest Forest Management Plan. This should give you some comfort that only in rare circumstances will landowners be able to harvest to the rule minimum. For this reason, we support an effort going forward to track when landowners leave more than the minimum. It may be that you discover new rules are unnecessary. To the contrary, new rules may result in landowners having to leave far more than necessary.

You have difficult work before you. As a representative of Oregon's largest forest landowners, I implore you to be mindful of the science, and skeptical of the need for change. Thank you for your time.

Heath Curtiss
General Counsel and Director of Government Affairs

STANDING TIMBER AGE CLASS DISTRIBUTIONS ON PRIVATE LANDS IN WESTERN OREGON



PRIVATE INDUSTRIAL

	ODF FINAL	w/ LEMMA	Difference	
			\$/Ac	%
Western OR Avg	\$ 5,107	\$ 7,841	\$ 2,734	54%
Coast Range	\$ 5,361	\$ 7,988	\$ 2,627	49%
Interior	\$ 5,096	\$ 7,645	\$ 2,549	50%
Western Cascade	\$ 5,002	\$ 7,544	\$ 2,541	51%
South Coast	\$ 3,235	\$ 7,082	\$ 3,847	119%
Siskiyou	\$ 2,380	\$ 5,219	\$ 2,839	119%

PRIVATE NON-INDUSTRIAL

	ODF FINAL	w/ LEMMA	Difference	
			\$/Ac	%
Western OR Avg	\$ 7,155	\$ 10,180	\$ 3,025	42%
Coast Range	\$ 8,326	\$ 11,017	\$ 2,691	32%
Interior	\$ 7,811	\$ 10,792	\$ 2,981	38%
Western Cascade	\$ 7,916	\$ 10,613	\$ 2,697	34%
South Coast	\$ 4,205	\$ 8,476	\$ 4,271	102%
Siskiyou	\$ 3,293	\$ 6,645	\$ 3,352	102%

