

Wednesday, March 08, 2017

Chair Imeson and Members of the Oregon Board of Forestry:

My name is Ted Lorensen. I am a retired forester with considerable experience in issues related to forest practices and "source water assessments." As you know a display of concern has been made by some parties about a 2015 draft coastal drinking water resource guide that was withdrawn by the Oregon Department of Quality (ODEQ).

It is my experience that ODEQ does not withdraw documents unless it believes that the concerns raised about the document have strong technical merit. I know that the Department of Forestry (ODF) and others have raised concerns about individual source water assessments for more than a decade. Based upon my involvement, the broadest of these concerns centered around the failure of assessment methodology to put forest practices in a context of a regulated program, failure to put forest practices in a context of natural geological and ecological process (i.e.; management-related risks within the context of naturally occurring hazards and risks), and finally failure to include within the assessment meaningful ways to assess risks related to dynamic forest processes such as fire, soil erosion and earth movements. In addition to these broad scale concerns, ODF and others, have raised many concerns about the technical merits of the specific methods used to assess hazards and risks. For example, ODEQ has used road density as a proxy for sediment risk from roads. Such a simplistic approach is not supported by science.

That ODEQ proceeded without consulting ODF during the preparation the 2015 draft coastal drinking water resource guide only served to perpetuate the fatal flaws in their ongoing technical approaches and more importantly provides absolutely poor service to the intended customers, the water users. The fact that ODF has worked with ODEQ to ensure that the merits of the process will be improved speaks well for the leadership of ODF on this matter. Going forward it is important that the agencies embrace a robust and transparent public process that includes early engagement with the designated management agencies for regulation of forestry and agriculture in order to avoid a product that does not serve Oregon citizens in a meaningful and substantial manner.

Sincerely,

A handwritten signature in cursive script that reads "Ted Lorensen".

Ted Lorensen