

# Committee for Family Forestlands

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November 2, 2010

John Blackwell, Chair  
Oregon Board of Forestry  
2600 State Street  
Salem, OR 97310

Dear Chair Blackwell and Board Members:

The Committee for Family Forestlands has been intensely interested in the on-going discussions within the Department of Environmental Quality (DEQ) and between ODF and DEQ concerning nonpoint source pollution of state waters. These water issues, including those involving the Coastal Nonpoint Program, should be at the top of Board and ODF work priorities.

The nonpoint source pollution water issue is of tremendous importance to private landowners and to smaller landowners in particular. Smaller parcels are likely to be disproportionately affected by new rules and regulations that may affect nonpoint source contributions to water pollution. Buffer requirements in riparian areas tend to "eat up" disproportionately larger portions of small ownerships.

Being able to act quickly when a market opportunity arises is also extremely important to private land owners. Time-consuming processes for approving forest activities can result in lost market opportunities for small owners, who ordinarily do not have foresters, loggers, and haulers on staff or on call and who may well have a greater need than industrial owners to "time" the market correctly. In addition, regulatory certainty and the concomitant ability to plan for an economically and environmentally sustainable future are key concerns of family landowners.

Most private landowners want to "do the right thing" with respect to water quality, in a fair, equitable, and scientifically-sound manner. For the most part, small forest lands occupy important, lower reaches of streams. Small landowners have a particular and intense interest in what and how the public wants them to contribute to water quality.

Regulation of nonpoint source pollution is a Tier 1 issue for 2010-2011 for the CFF. The CFF's Work Plan states: "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 DEQ on point source water quality concerns." To maintain efficiency and consistency in the administration of the Oregon Forest Practices Act, the CFF believes it is critical that the BOF maintain the responsibility for and oversight of water quality on forest lands.

The CFF feels strongly enough about this issue to ask you to re-prioritize ODF staff workloads to accommodate more hours on nonpoint source pollution issues. Planning and other projects that are more general, longer term, or are not as urgent should be put on the back burner until these

water issues are resolved. You will be doing small landowners and Oregon forestry a great service by investing greater effort now in resolving the water issues raised by DEQ, before private forestry is subjected to regulatory decisions that forestry did not help fashion and which may present new and unforeseen problems.

Please do not hesitate to involve the CFF in future discussions with DEQ and others on this issue.

Sincerely,

Committee for Family Forestlands



Craig Shinn, Chair

cc: Oregon Board of Forestry Members  
Nancy Hirsch, Acting State Forester  
Peter Daugherty, Acting Private Forests Division Chief