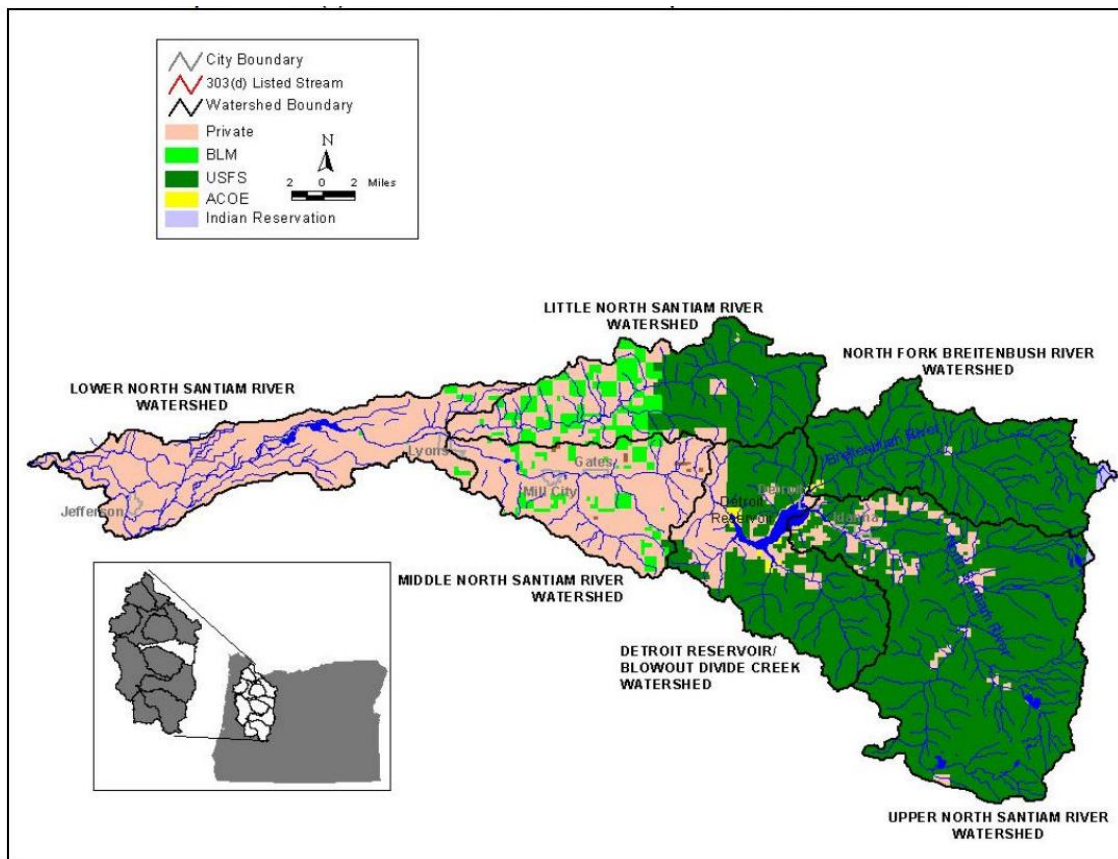


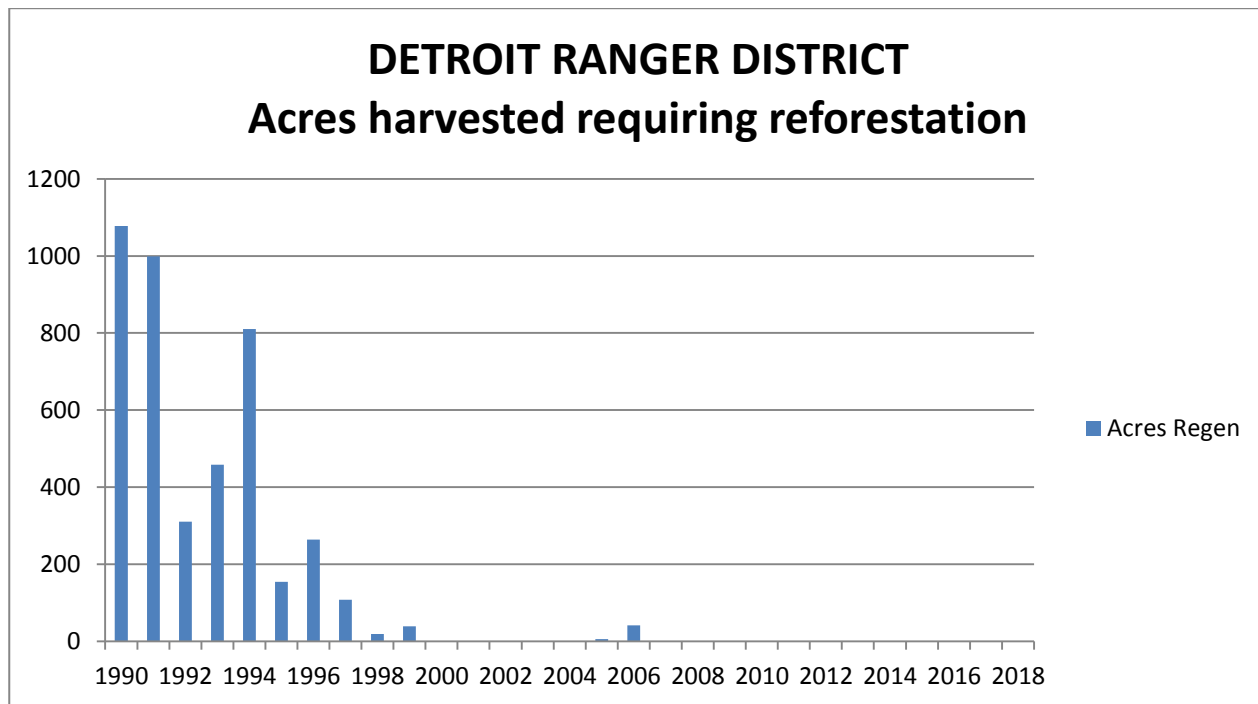
House Bill 2656 - Opposed

My name is David Leach and I am writing this letter to provide input to proposed House Bill 2656. My response to the bill is based on an article in the Salem Statesman Journal article of March 13, 2019, that reported on the public hearing on March 12th. I have also read the bill as it is written. I am a retired silviculturist/forester and spent 25 years on the Detroit Ranger District of the Willamette National Forest. Based on the Statesman Journal article and statements made by supporters of the bill, I felt that it is important to refute some of the statements made. Primarily, claims that this bill will prevent “disasters such as last year’s Detroit Lake algae bloom”, are totally unsupported by the facts associated with that event and should not be used to justify a statewide ban on certain forest management activities. Although the bill is intended to regulate private land, the forest land tributary to Detroit Lake is overwhelmingly in federal ownership, and so the history of timber harvest and effects has been dominated by national forest timber sales. If there is, as is claimed, a link between past logging and Detroit Lake water issues, then federal timber sale activity must be considered as having the major role.



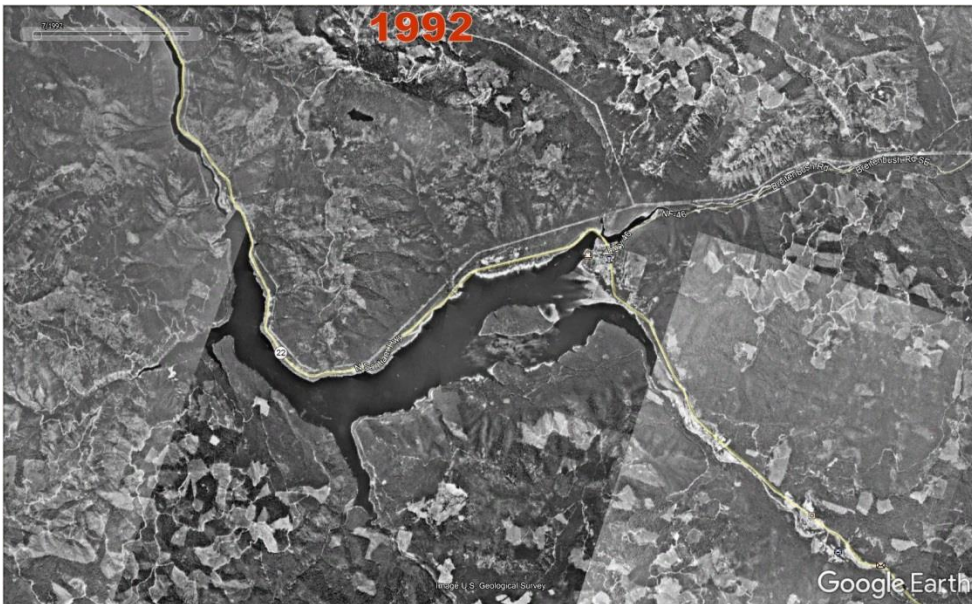
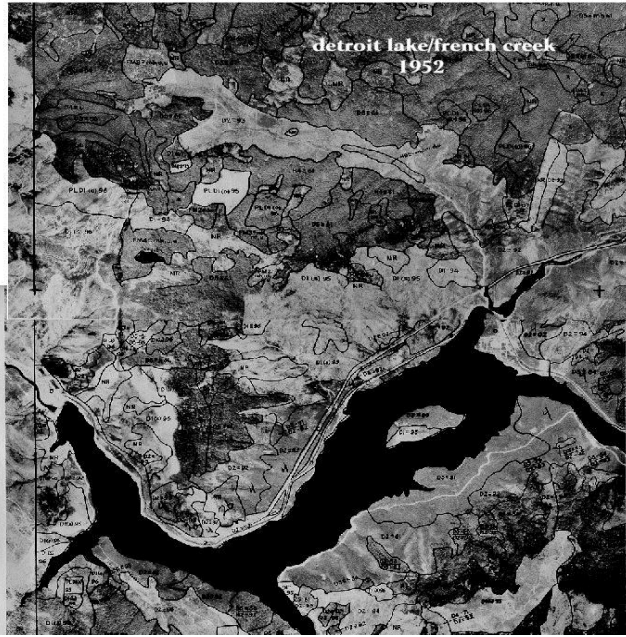
Land Ownership in the North Santiam Watershed

I do not have information regarding timber harvest on private land but it is a minor portion of the watershed. The graph below shows the change in timber harvest on the Detroit Ranger District since 1990 and includes all acres requiring reforestation.



In order to make a claim that timber harvest has caused the problems in Detroit Lake there needs to be actual proof not simply speculation. Prior to 1990, the Detroit District clearcut about 2200 acres per year and that was the average for several decades. I do not have information to graph the frequency and duration of algae blooms in recent years but it is obvious that there is no correlation with history of timber harvest. If there is a trend, the blooms have increased as the timber harvest has declined. The logged areas of the mid-1990's are now over twenty years old with trees averaging over 30 feet tall. If they were ever a source of significant sedimentation, it should have occurred when they were first cut, not now. These stands of trees are now water consumers. Before 1990, over 20,000 acres per decade were clearcut on the Detroit District but I do not recall toxic algae blooms as an issue.

If you wish to look farther back, here is the Detroit Lake area in 1952 showing a combination fires and timber harvest and more recently in 1992 and 2018:



Aside from timber harvest, forest fertilization and pesticide use were mentioned as other treatments needing more regulation. As far as the Detroit Ranger District is concerned, there has been no fertilization since 2005, and any of the nutrients involved have been absorbed long ago in growing trees and other vegetation. Very few herbicides were ever used on the District, less than 500 acres in total and all prior to 1995. It is interesting to note that only about 4% of herbicide use in Oregon is forestry related. The very same or related chemicals are used on cropland, directly on food crops, and residential lawns. I'm reasonably confident that the fertilization percentage is even less on forest land. The other distinction is that agricultural fields typically have much less vegetative cover, especially during the winter, and often receive multiple treatments per year of both pesticides and fertilizers, whereas forest lands may only be treated once, if at all, in the life of stand. If the authors of this bill are serious about reducing the use of chemicals in the state then they are focusing on a tiny part of the problem and I suspect not willing to tackle the non-forestry related users.

My final comments are in regards to alternatives to clearcutting. Clearcutting is not appropriate for all forest types and locations and has been overused in the past. Although it may be visually displeasing to many people, that does not necessarily mean that it can't be done and achieve acceptable environmental outcomes. If clearcutting is applied as a cookie cutter approach without regard to site specific conditions, than those responsible should be held accountable, but that does not mean that it is not a viable method for forest managers.

I have worked in various locations throughout the western U.S. and seen numerous example of selective logging where the effects of multiple harvest entries has caused excessive soil disturbance, damage to trees from logging equipment and changes in forest structure that may not consistent with natural forest development. Selective logging requires multiple re-entries into timber stands which also means roads need to be used more often and cannot be closed or decommission for long periods. On steeper ground, equipment and logging systems are much more expensive, and with selective logging, lower volumes per acre significantly decrease profitability. It is also much more difficult and expensive to treat fuels to reduce fire hazard on steep ground, especially when treatments such as prescribed burning are precluded.

According to the newspaper article, this bill is envisioned to have an effect on reducing carbon emissions . First of all, I think climate change is real and happening, but I don't see this bill lessening its trajectory. Primarily I view it as an anti-forest management bill. The premise of a connection between algae blooms and forest management are not supported by any evidence. I believe that it is more likely an attempt to further a larger agenda using the unfortunate situation that occurred at Detroit Lake in 2018. If this bill were passed it would more than likely simply make Oregon's timber economy even less competitive in the world market . As has happened in the past, other players are willing to step forward and fill the gap in timber supply. Moving the problem north of the border to the cold, slow growing forests in much of Canada just shifts the problem elsewhere.

And before I forget, there was a minor disturbance in 2017, specifically the 11,000 acre, lightning-caused, Whitewater Fire. The fire was totally in the North Santiam watershed and above Detroit Lake and should at least be given consideration as a potential nutrient source.