## Small Private Timber Owner in Opposition to OR SB 892

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I am the manager of Coos County Sheep Co., a 2,000 acre timber company located 12 miles southeast of Coos Bay, Oregon. I am writing in opposition to SB 892 which would make it difficult to afford, and potentially impossible to schedule the herbicide treatments we use following every harvest.

In order to increase young seedling growth and development, we use herbicides to control the competing weeds and invasive species on our sustainably managed forest lands. These treatments allow our living investments a competitive advantage in the first two crucial years of growth; a time when weeds specialize in rapid overcrowding of the slow growing tree stock.

Even under current regulations, it's difficult to schedule these treatments because operations are weather dependent. The constantly changing winds and rain of Oregon heavily restrict operations, and selecting a single date to reliably treat a unit is virtually impossible. In 2016, our company applied herb treatments nearly 3 weeks after the originally forecasted date, and the equipment sat idly on our landing for 3 days, waiting for appropriate weather conditions. Other owners waited behind us. Because these treatments are also dependent on seasonal growth cycles, time is an overall limiting factor each year.

Small private land owners have further difficulty scheduling ships for their use because industrial owners have more clout. In response, we cluster our treatments together. This is the only semi-reliable way we can insert ourselves into the applicators' schedules, and every land owner must wait on the compounding treatments preceding them. The changes proposed in SB 892 would only increase these delays. Toward the end of the season, low ranking owners would be forced to consider less effective or ineffective treatment windows.

In some areas of Oregon, a tragically undeniable consequence would be the elimination of small land owners from the applicators' already tight schedules. Preference will always be given to large industrial owners because their larger units can be treated at a lower cost and provide more reliable sources of revenue to applicators. At best, these regulations would greatly increase our treatment costs by forcing us to use less efficient treatment methods. At worst, the increased time constraints would overburden local labor resources and remove one of the most valuable tools from our management tool box.

I strongly urge you to oppose SB 892 to help land owners keep Oregon's renewable working forests healthy and strong.