

Jeremy Norby <JeremyN@giustina.com>

Dear Chair Ken Helm and Fellow House Members:

Giustina Resources, LLC appreciates the opportunity to provide comments on Oregon HB 2656. Giustina Resources, LLC manages Giustina family owned forestland in western Oregon. The Giustina family has actively and sustainably managed private timberlands in Oregon for nearly 100 years. We do not believe the passage of HB 2656, in any form, is warranted for the reasons set forth below.

First, HB 2656 is aimed at solving a problem that does not exist. According to the Oregon Department of Environmental Quality, Oregon forestlands currently provide the highest quality of water in the State compared to other land use classifications. There is no credible science that demonstrates that the banning of regeneration harvests, road construction or use of pesticides will improve the quality of Oregon's water. In fact, it is the lack of active forest management that poses the greatest threat to water coming from Oregon's forests.

Second, HB 2656 will force landowners to mimic the management practices of the federal forests. Each summer, on average, 85% of the acres burned by wildfire in Oregon occur on federally managed forests. These devastating wildfires cause the release of millions of tons of carbon into the atmosphere and strip the hillsides bare of vegetation leading to the delivery of large quantities of sediment to Oregon's water. Passage of HB 2656 would greatly increase the risk of wildfire destroying our Oregon communities and the water upon which they rely.

Third, the Oregon Forest Practices Act works. In 2017, forest landowners were 99% compliant with rules for operations near Oregon's water resources and there have been zero incidences of pesticide violations in forestry over the past three years. According to the Eugene Water & Electric Board, who supplies drinking water from the McKenzie River watershed to Eugene and east Springfield, there have been only three confirmed pesticide detections above laboratory detection limits in the McKenzie River since 2001 when sampling began. It is unknown if these three detections originated from forestry, agricultural, residential, or urban sources but it is important to note that no pesticides have been detected in EWEB's treated drinking water. Oregon's private forest landowners care about the land they manage and Oregon's water, which the above data proves.

Thank you for the opportunity to comment on HB 2656. We sincerely hope the Committee recognizes the severe negative impacts passage of this Bill will have on Oregon's communities, economy, forests, and water.

Sincerely,

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