



Thank you Chair Dembrow and members of the Committee for the opportunity to provide comments on SB 931. My name is Mark Wall and I am the Land & Timber Manager for Roseburg Forest Products. I am a professional forester who has practiced forestry in the Oregon Coast Range for over 30 years. I am opposed to SB 931 for the following reasons;

- **Spray drift is already prohibited by state and federal law.** In the past three years there have been zero violations or civil penalties levied against the aerial application of herbicides to timberlands. This bill is a poorly conceived solution to a problem that does not exist.
- Many of our neighbors in rural Oregon live without internet or cell phone coverage. The system of notification envisioned by this bill will simply not reach many of them and in Roseburg's experience, few if any of our neighbors even subscribe to FERNS.
- A review of Roseburg's spring 2019 aerial application project confirms our belief that the primary users of the FERNS notification system are environmental groups and activists that are opposed to sound forest management.
  - Out of 350 units planned this spring only 45 shared a common property line with 61 neighbors who live on their property.
  - **These 45 units represent 13% of all planned units with all remaining units having zero proximity to neighbors.** This is slightly more than normal with most projects having only 5-10% proximity to neighbors.
  - **While all 350 units have FERNS subscribers, none of those subscribers are adjacent neighbors.** In fact, the majority of the subscribers are individual activists or known environmental groups who don't live anywhere near our project sites. We identified a number of current FERNS subscribers in Lane and Douglas County who we know to be anti-forestry activists who have participated in, or who are actively encouraging direct action activities against timber companies. SB 931 will simply give them even more access to sensitive information about where we are operating on any given day.
- **Roseburg Foresters have reached out and talked personally with every one of the 61 neighbors** in this year's spring aerial application project, as we do every year, either by phone or in person to notify them of our plans and to listen to any concerns they may have. All concerns are duly noted and accommodations are made where appropriate to address these concerns. **This practice of engagement with our neighbors and the personal contact and relationship building that it fosters is a core principle for Roseburg** and I know many of my peers in Forestry follow similar outreach efforts to communicate and engage on a personal level with their neighbors.

- SB 931 is inferior to how Roseburg currently communicates with its neighbors and would not benefit them given the lack of neighbors who are currently subscribing to FERNS. I would like to think that the level of outreach we do is the main reason why more of our neighbors do not subscribe to FERNS but it is more likely a combination of factors including **effective communication by us, a lack of access to technology to access FERNS, and a general apathy and lack of concern about what we are doing as expressed to us by the majority of neighbors we talk to.**
- The narrow notification requirement will be logistically challenging to comply with as foresters often work in remote areas without access to cell phone or internet connections until they get back to the office when foresters may still be out in the field past 5 pm when weather conditions allow.
- Daily production can vary due to a number of factors and can range from 0 to 700+ acres. Some units may also be planned but not executed because winds were unfavorable to a sensitive neighbor. Under the proposed notification system, these variables would lead us to notify many more units than we might feasibly accomplish to accommodate this uncertainty and provide us certainty that we can get a full work day in when the weather allows. This could result in one unit receiving multiple notifications in the FERNS system until it is finally treated. This unintended consequence would only create more confusion to those subscribers interested in following our activities.
- Real time notification to all subscribers could result in landowners and their employees as well as their Contractors being **harassed by activists and incurring potential sabotage to equipment** when those intent on stopping aerial applications know where we will be the next day.

Thank you for listening to my testimony today and I hope that you make the right decision not to pass this bill out of your Committee.

Respectfully submitted,

Mark Wall

Land & Timber Manager

Roseburg Resources, Co.