

April 2, 2019

Senator Michael Dembrow
Chair, Senate Committee On Environment and Natural Resources
900 Court St. NE, S-407
Salem, Oregon 97301

Re: SB 931

Senator Dembrow and Members of the Senate Committee On Environment and Natural Resources;

I appreciate the opportunity you have granted us to testify before you this afternoon on SB 931.

My name is Kent Tresidder. I am a professional forester, a member of the Society of American Foresters, and a member of the Oregon Small Woodlands Association. Our family owns and operates a tree farm of several hundred acres near Coquille, OR. Our tree farm has been in the family for 62 years - three generations. My family hopes to keep it as an operating tree farm. It has been managed on a responsible and sustained yield basis during our ownership. Our tree farm was, in fact, chosen as the 2009 Coos County Tree Farm of the Year. We take some pride in that.

SB 931 gives me a lot of concern, as it does many other private forestland owners.

My primary concern is that SB 931 would strike a big blow to successful reforestation on private forestlands in Western Oregon.

The requirements of Subsections 2 and 3 under Section 1 are so impracticable that they are effectively impossible to meet. Communication with the department from the forest is often very sketchy. And for many, including myself, the FERNS system can be very difficult and time consuming to negotiate. Weather conditions can change rapidly, either aborting operations quickly or suddenly permitting them to take place. Small woodland owners are usually grouped with larger landowners in an area of herbicide application. Because they are usually last on the priority list for spraying contractors, small owners are particularly vulnerable. Together, all these factors lead me to fear that, under this bill, our tree farm would never be able to conduct an aerial spraying operation again. The cost of subsequently doing manual treatment is economically prohibitive for us, and most other small forest owners.

The result is that site prep spraying would not be done on our tree farm. Without controlling competing vegetation, the success of reforestation is pretty dismal.

With poor reforestation, the value of the timberland suffers, sometimes significantly. I should mention that I am also a licensed real estate appraiser. I've seen a lot of examples of poor reforestation and how it negatively impacts land values. Poor reforestation hurts everyone in the community. That's why there are strict regulations requiring landowners to reforest their timberland in Oregon (ORS 629-610). Not only does poorly stocked forestland result in less taxes, but it also negatively impacts the logging and milling workforce. In fact, SB 931 appears to be in direct opposition to the objectives of ORS 629-610.

Another concern I have are the reporting requirements of Section 2 of this bill. They are not only unreasonable but very costly for the applicator and the department. Who will verify the accuracy of these reports? Are they even verifiable? How much would verification and enforcement cost?

Will SB 931 be like other laws on the books, such as HB 2098 (the Pesticide Use and Reporting System), which are either unfunded or otherwise unenforced? Passing a law that is unenforceable may satisfy the legitimate desires of a concerned public but it really doesn't help those of us who have a legitimate responsibility for managing forestlands.

Finally, I would like to extend to you and your committee an invitation to visit our tree farm. I would like to show you the reforestation we've achieved with proper herbicide application. Then I'd like to show you an example of a reforested unit where we were unable to achieve site prep treatment due to an aerial contractor being suddenly decertified. The difference in reforestation results is quite remarkable.

I must oppose SB 931 the way it is currently written. I hope that, with your enlightened consideration, you will do the same.

Again, thank you for hearing my concerns.

Respectfully,

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