

Heritage Forest Products LLC
4820 NW High Heaven Rd
McMinnville, OR 97128
March 18, 2011

DEQ

MAR 21 2011

Water Quality

Andrea Matzke
Oregon DEQ-Water Quality Division
811 SW 6th Ave
Portland, OR 97204

By Fax 503-229-6037 and US Mail
RE: DEQ Toxics Reduction Rulemaking Proposal

Dear Ms. Matzke,

Recent events have prompted the DEQ to propose the revision of current water quality standards. I have the following comments.

As a private woodlands owner-manager, I am concerned that the above proposes to fix what has not been scientifically shown to be broken.

Oregon has regulations in place that set rigorous standards for the protection of water quality on forest lands. On-going studies by Oregon State University show that these high standards continue to be met, implying that the Board of Forestry has effectively enforced them.

A regional forestry office serves as a "single point of contact" for multiple needs of a forest landowner. I appreciate the increased efficiency in dealing with one versus multiple agencies.

Changes in the current regulatory framework will have a greater impact on family forest lands, which tend to be lower in the watershed, in mixed use, agricultural/forest zoning.

Family forest farms are labor intensive, low margin operations. Owners maintain their farms largely out of a sense of love and obligation towards their land. I personally have a Stewardship plan overseen by a Forester consultant.

Nevertheless, an increase in economically inefficient rules will force families barely holding on through this economic downturn, to sell. Neighbors that fall into this category tell me their only potential buyers would divide the farms into lots for future development.

Family farmlands constitute a "social good". Their owners keep land forested and work closely with ODF to maintain high environmental standards. DEQ proposes to enforce a theoretical "social good", not based on science, with the ironic consequence of turning the actual "social good" of family forestlands into housing developments.

If the DEQ is determined to revise current water quality standards regulation (despite no scientific basis), I ask that the enforcement responsibility remain with the Board of Forestry, so that the additional burden on forest land owners not be compounded by having to answer to multiple agencies.

Sincerely,

