

Candace Bonner

RE: Public Comment, July 23, 2015 Board of Forestry Meeting. Agenda Item 2,
Developing riparian rules prescriptions

July 23, 2015

State Forester Decker, Chairman Imeson, and Members of the Board of Forestry:

I submitted written commentary on the riparian rules process at the last Board meeting and appreciate the opportunity to add a few additional comments.

First, we should all take note that this is the warmest year in Oregon in 100 years, with record breaking temperatures in the Columbia. Rivers and streams are low due to our warm winter and low snowpack, with another warm winter predicted. Salmon die-offs due to warm water are in the news, in the Deshutes, the Columbia, and the Willamette Rivers. Even the large salmon and steelhead spawning stream crossing my own property appears to have exceeded the biologic marker of 18 degrees centigrade this year.

This makes the point that the biologic danger levels are easy to exceed in hot years, and that we need to protect our riparian areas adequately for the hottest years as well as average years. Unusually hot years are predicted to become increasingly frequent. The other point is that the Oregon public is currently acutely aware that our streams and rivers are too warm and salmon are dying.

Second, the Forestry Department staff report outlines three categories of prescriptions for riparian protection, but only the first, with a no-cut riparian buffer, fully protects cold water. Peter Daugherty discusses the possible "unintended consequences" of a no cut buffer in the Staff Report. He references OAR 629-640-0000, Desired Future Condition (DFC) of mature streamside stands:

The desired future condition for streamside areas along fish use streams is to grow and retain vegetation so that, over time, average conditions across the landscape become similar to those of mature streamside stands. Oregon has a tremendous diversity of forest tree species growing along waters of the state and the age of mature streamside stands varies by species. Mature streamside stands are often dominated by conifer trees. For many conifer stands, mature stands occur between 80 and 200 years of stand age. Hardwood stands and some conifer stands may become mature at an earlier age. Mature stands provide ample shade over the channel, an abundance of large woody debris in the channel, channel-influencing root masses along the edge of the high water level, snags, and regular inputs of nutrients through litter fall (OAR 629-640-0000).

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I stated previously why I believe we need a no-cut riparian buffer. I see the “unintended consequences” of active management in the RMA being the elimination of the likelihood of ever achieving the DFC. When I moved on to my forest land 13 years ago, many of the streamside areas in this watershed were in the desired state of shady mature stands, dominated by conifers 60-80 years old, with no or few invasives. Over the years, many of the streams have had clear cut harvests, often appearing to be actively managed down to the 20 ft no cut line, and many of the remaining buffer trees have gone down in the first three years. None of these RMAs will achieve the desired future condition in my lifetime. With the current short rotations, I doubt they will ever be in the DFC state again. The unintended consequences of active management can be transforming shady, mature, conifer-dominated streamside, to mainly shrub and hardwood with only smaller diameter conifers remaining.

I continue to believe that a no-cut buffer is the best way to have any chance of achieving the DFC, and retaining most of the larger conifers within the RMA. If the Board does choose to continue active management in the RMA, I believe it is essential to add more limitations than merely basal area requirements, such as borrowing a page from the California rules, which require thinning in the RMA to increase tree diameter, require leaving the 13 largest trees per acre, and require 70-80% remaining canopy. Hardwoods do make a valuable contribution to shade, but as long as they are counted in basal area, the actual result is to permit harvest of more of the larger conifers within the RMA, again leaving us further from the DFC.

Third, we are all concerned about economic impacts to timber companies with increased protection of our riparian areas, and disproportionate impact to small woodland owners. As I have stated previously, the small landowners I have spoken to in my area have chosen not to enter the RMA when they harvested. All are upset by what they perceive as damage to the streams, including small n streams as well as fish streams, by the industrial timber harvests in our area. The small woodland owners I have spoken to are in favor of simple no cut RMAs on all streams, including n streams. My woodland neighbors are of course a small sample. For those small landowners who would be hurt by losing money from trees which they would harvest under the old rules, I suggest we consider the Washington riparian rules which give exemptions to small landowners. (See Summary of Riparian Rules for Neighboring States, page 5.)

I agree with Peter Daugherty that the best way to protect Oregon’s environment is to keep our private forest land in working forest, and that Oregon benefits environmentally as well as economically from a thriving forestry industry. However, I believe forestry cannot thrive long term unless the Oregon public, including environmentalists, believe in and support the environmental benefits of a thriving timber industry. This will not happen until we can all trust that our shared natural resources of water and wildlife habitat are adequately protected, and not threatened by forest practices. This is the moment to win the public’s trust, by enacting rules that fully protect cold water and riparian habitat. Any halfway measures, any compromises that compromise riparian

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health, will continue to foster public mistrust. I urge you to look at the big picture and the long term consequences as you struggle to make the best choices for Oregon. And I urge you to put a temporary set of rules in place now, so we will not have further compromise of our streams while waiting for our new rules to go into effect.

Thank you for taking the time to read and consider this in your deliberations.

Respectfully submitted,

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