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Board of Forestry
2600 State Street
Salem, OR 97310

Re: FPA Riparian Rule Review

Buffers of at least 100' are needed on small and medium Type F streams in order to provide cooler water downstream. Basically, the Forest Practices Act is upside-down: On large rivers, the portions with the highest protection are primarily transportation corridors rather than being used for spawning or rearing. The source of cold water during summer is water stored from winter precipitation, and the places where that can happen are in the areas least protected. Standing trees buffer rain and their root systems help retain both water and soil. That water is released slowly rather than as runoff. That contributes cold water to the entire system, helping maintain temperatures low enough to support fish downstream.

When we first began collecting data in Northwest Oregon's Salmonberry River in the 90's, I thought that nothing could threaten the run of wild winter steelhead. As timber harvest has increased from a few thins in the early 90's to extensive clearcuts on private land in the headwalls of the basin, floods have become ever more catastrophic. The main stem of the river has not yet been able to repair itself from the December '07 flood; while we are seeing record counts of redds and spawning fish in the North Fork, main stem counts are extremely low, a fraction of what they used to be. Finding the main stem channelized, without gravel for long stretches, the fish have moved to the North Fork, which has recently seen extensive clearcutting on the headwalls. What will happen during the next flood? Where will the fish go if their North Fork alternative is blown out and channelized?

River Graphics does graphic design and marketing for sport fishing companies. We rely on healthy fish runs so that our clients can sell to sport anglers.

Thank you,

Joyce Sherman