



**BEFORE THE OREGON BOARD OF FORESTRY**

27 April 2016

***Meeting the Protecting Coldwater Criterion the Siskiyou & Eastern Oregon  
(Item 5: Work Plan)***

Association of  
Northwest  
Steelheaders

I am Mary Scurlock, Coordinator of the Oregon Stream Protection Coalition.

Audubon Society of  
Portland

Cascadia Wildlands

Center for Biological  
Diversity

Coast Range  
Association,

We appreciate the Board’s pausing to consider whether and how riparian protection for the Siskiyou and Eastern Oregon can be addressed in the short term through your work plan. Staff has presented two options: 1) create the capacity to take immediate action by dropping further work on either the westside Riparian Rule or the Monitoring Strategy; 2) approve the work plan as is, which includes finishing the monitoring strategy, and “use the September 2016 review of the updated monitoring strategy to set priorities for monitoring projects.”

Defenders of Wildlife

We recommend that the Board choose elements of both options.

Hells Canyon  
Preservation Council

- We hope you will clearly recognize today that the issue is a high priority and deserves immediate action, but not at the expense of derailing other ongoing, near complete major projects. Rather, the analysis required to take next steps will be integrated into the monitoring strategy to be completed by September.

Institute for Fisheries  
Resources

KS Wild

- Board deliberation is necessary to develop clear direction to the Department as to the information you require to address the inadequacy of riparian shade in the Siskiyou and on the Eastside. The question of whether Siskiyou and Eastside riparian rule analyses should proceed separately or together in terms of policy change remains open and also requires deliberation.

McKenzie Flyfishers

- Any monitoring and research proposed as necessary to support a policy change should be accompanied by a hard timeline. Clarify that an open-ended long-term monitoring do-loop is not an acceptable option given that available information has already overturned any presumption of adequacy of current riparian rule statewide.

Native Fish Society

- If any policy change in the excluded regions is deferred pending research and/or monitoring the Board should consider interim temporary rule changes to protect at least small and medium SSBT streams.

Northwest  
Environmental  
Advocates

Northwest Guides  
and Anglers

Northwest  
Sportfishing Industry  
Association

Oregon Wild

Pacific Coast  
Federation of  
Fishermen’s  
Associations

Pacific Rivers Council

**Discussion**

Rogue Riverkeeper

Urgency of action and presumption of inadequacy to meet PCW. The streams of the Siskiyou and Eastern Oregon, our hottest driest regionsm deserve adequate riparian protection, and all evidence indicates that current rules are not adequate to meet water quality requirements related to stream temperature, included but not limited to the PCW.

Sierra Club

Trout Unlimited,

Umpqua Watersheds

The Wetlands  
Conservancy

Wild Earth Guardians

Wild Salmon Center

Further Direction Needed. We concur with the staff report that Board direction is needed to “on the specific monitoring question and the type and level of detail (monitoring or research evidence) desired to inform Board action for the eastside and the Siskiyou” and that “the Board has not yet undertaken this level of focus on this topic.” To the extent that this implies that the Board should consider focusing on questions other than whether current rules meet the PCW, we would concur only if those questions would essentially subsume the narrow issue of harvest-related stream warming in a broader focus on the totality of riparian functions. It is not acceptable to consider setting aside the issue of PCW attainment.

The Board should not take staff references to data in SER to mean that we know virtually nothing about stream warming in the Siskiyou and EaStern Oregon. The staff report notes that in the recent “systematic review of literature that contained primary measurements of stream temperature, riparian shade, or a proxy of the latter” completed in January 2013, found “no relevant studies in the Siskiyou region.” But this statement applies to the very narrow definition of “relevant” chosen by the SER review. This does not mean for example, that the RipStream study itself is not relevant to the issues before the Board.

The staff goes on to say that “[w]ith the Board’s November decision not to extend the riparian rule results to the Siskiyou region, the department does not have temperature monitoring evidence related to forest practices in that region.” This could be misinterpreted. The lack of ODF monitoring sites in the region does not mean that those data are not relevant and could not have been reasonably extrapolated to support a rule change or that there is not other information that supports such extrapolation.

Timing of potential policy change in Siskiyou v. Eastern Oregon. The staff materials seem to imply that the Board has decided to address riparian matters for eastern Oregon and the Siskiyou together. We urge the Board to defer this important policy decision, recognizing that the Siskiyou is part of the Coastal Zone and inaction here relates directly to the current coastal nonpoint plan disapproval by NOAA and the loss of federal funding. Given that the Siskiyou was only dropped from the pending riparian rule a few months ago, there was a period of several years during which the Board was operating under a finding of resource degradation that included this region.

Resources for Adaptive Management. We are concerned that the Department lacks adequate resources to avoid the kinds of tradeoffs before you today. I hope we can find ways to work together in the future to help alleviate this problem.

Sincerely,



Mary Scurlock  
Coordinator

Oregon Stream Protection Coalition



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