

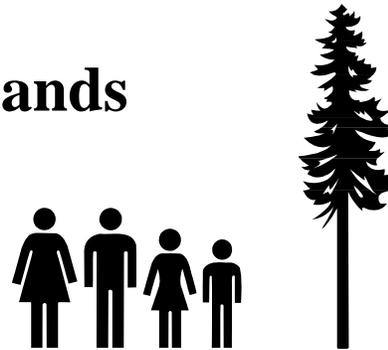
Committee for Family Forestlands

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March 12, 2014

Tom Imeson, Chair
Oregon Board of Forestry
2600 State Street
Salem, OR 97310

RE: Protection Standards on small and medium fish bearing streams

Dear Chair Imeson and Board Members:

The Committee for Family Forestlands* informed the Board of Forestry by letter dated April 3, 2012 that the Committee has closely followed discussions concerning water quality and forests including the recent Ripstream and paired watershed studies. We have continued to follow the issue as the time for rulemaking quickly approaches. As the Board considers options for dealing with the Protecting Cold Water criterion, we ask the Board to keep in mind that rule changes have the potential of creating huge negative impacts to family forest landowners. In many cases family forestland owners own the lower reaches of watersheds and therefore have a higher concentration of fish bearing streams when compared to forest ownership as a whole. Any increase in stream protection will place a higher percentage of the burden on the family forestland owners.

The State of Oregon and many shareholders have made tremendous investments in research projects, most notably Ripstream and the Trask, Alsea and Hinkle Creek paired watershed studies. The rule change discussions have focused primarily on the Ripstream study. While the Ripstream study focused on water temperature, the paired watershed studies look at many other hydrologic and biological factors. It is critical that the information learned in these paired watershed studies and any other applicable research be considered before making a decision that has the potential of having a huge negative impact on private landowners.

The results from the paired watershed studies suggest that fish in some cases are more abundant and larger in size after forest harvest. This is despite a slight increase in water temperature. This suggests that the Protecting Cold Water criterion, which does not allow more than a 0.3 degree Celsius temperature increase, may not be the appropriate objective when considering the needs or preference of fish. We recommend that the Board work with the Environmental Quality Commission to take a critical look at the 0.3 degree criterion in light of the recent research and to focus on beneficial use of forest streams rather than solely on water temperature criteria. This should be done prior to any rule making.

We realize that it is important to meet the requirements of the Clean Water Act. We also affirm the quality of scientific work that has been done. It is critical that a decision with potential adverse impacts on family forest landowners fully consider the body of science available and be made with a clear understanding of the biological benefits and the economic costs associated with the decision.

Please do not hesitate to involve the CFF in future discussions regarding forests and water quality generally, the role family forests play in maintaining Oregon's forest landscape, or policy issues specifically related to the clean water standards.

Sincerely,

Committee for Family Forestlands



Craig Shinn, Chair



Susan Watkins, Vice Chair

cc: Oregon Board of Forestry Members
Doug Decker, State Forester
Environmental Quality Commission Members
Dick Pedersen, Director, Department of Environmental Quality

* The Committee for Family Forestlands is a standing committee commissioned by the Oregon legislature to advise the State Forester and the Oregon Board of Forestry on issues relevant to some 70,000 family forestland owners in the state. Our committee is made up of family forestland owners from different regions of the state, environmental organization and forest industry representatives, a citizen-at-large and ex-officio members representing the Oregon State Forester, Oregon State University College of Forestry, Oregon Forest Resources Institute, the United States Forest Service, small forestland owner groups, and forestry interest/consulting groups.