INDEPENDENT
MULTIDISCIPLINARY
SCIENCE TEAM
(IMST)

State of Oregon

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November 19, 2001

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Dear Neal,

Thank you for the opportunity to review the proposed statewide riparian policy. The IMST applauds the effort and encourages further development of this policy and related policies that deal with natural resources across the state. In that regard, we feel there is a need for a statewide policy on the management of large wood in streams, rivers, and estuaries. It would complement the riparian policy.

This letter provides the specific review of the IMST of the riparian policy. It is in two parts: (a) **general comments** related to the overall impression the policy presented, and (b) **specific issues** the State should consider as the policy is revised and implemented.

General Comments

- The policy begins by addressing the scientific basis for a statewide riparian policy but seems to quickly move to anecdotes and portraying negative aspects of managing riparian areas to function more naturally. In our view the policy should clearly state what it is trying to achieve with emphasis on the positive attributes of naturally functioning riparian areas. Once these attributes are established the potential negative aspects related to the dynamic nature of riparian areas should be recognized. Our concern is that in the current draft the negative aspects are overemphasized such that they overshadow the positive benefits. As consequence, the policy may not be effective in achieving desired outcomes. The statewide approach to riparian management is too important for this to be the result. Judicious editing can solve this problem.
- The overall organization of the policy is poor. Important information is often buried within anecdotes or background information.
- Overall, this policy appears to be directed toward westside, forested systems where large riparian conifers are a desired feature. Rangeland riparian areas and some higher altitude streams may only require shrubs and perennial vegetation to attain and maintain function. In many of these areas large wood is also not needed for aquatic habitat.
- Another emphasis appears to be on fish bearing streams. Streams should be managed as systems within a watershed. Scientifically, the presence or absence of fish is not a key factor in managing a system at the landscape level.

- The policy should provide a framework for agencies to develop management guidelines. While the policy needs to avoid specific numbers such as widths of riparian areas, it should outline steps to determine the percentage of landscape that should be in a proper functioning condition and to determine the range of seral stages that may be present within a stream system. We believe this can be done using existing scientific framework.

Specific Comments

- As written there is no state agency or office that appears to have lead responsibility and oversight of individual agency policies and activities.
- The policy allows for a lot of latitude among state agencies. The policy should set standards, or provide for such standards to be set that each agency must meet and operate within. It is also not clear who within each agency will implement and oversee the direction the agency takes with the policy. Not all agencies have an effective administrative entity such as the Board of Forestry or the Fish and Wildlife Commission.
- The State should consider Proper Functioning Condition (PFC) as an assessment tool for state riparian areas (Prichard et al. 1993, Prichard et al. 1998). It can be applied to both eastside and westside riparian areas and to all stream channel types. PFC also recognizes riparian area site potential, which is currently not stressed in the draft policy. Site potential is the highest ecological status a riparian-wetland area can attain given no political, social, or economical constraints. Not all riparian areas are capable of reaching the same condition.
- The policy should address and minimize cumulative effects within the landscape. The condition and function of upland areas as they affect riparian area function should be addressed within the policy and by management guidelines developed by individual agencies.
- The policy should aid in the identification and development of riparian reference areas within different regions.
- Agencies that currently do not have effectiveness monitoring programs need to institute programs that can be integrated with other effectiveness monitoring programs within the State.
- Currently few agencies have an adequate adaptive management process in place. The State may want to look at Oregon Department of Forestry's adaptive management procedures under the Forest Practices Act as a guide for what for other agencies may be able to implement.
- The policy states that the State will promote partnership projects with other groups including local government, federal agencies, and tribes. Federal agencies own approximately half of the land in Oregon. Federal agencies do manage riparian areas under policies such as the Northwest Forest Plan. The statewide riparian policy should identify such policies and how State actions can address connectivity of riparian areas already under federal management. Once in place the policy will be more likely to promote collaboration between the State and other groups such as federal agencies.

Please let me know if we can provide further clarification or review as the policy develops.

Sincerely,

Logan A. Norris,
Chair, IMST

cc: IMST

Prichard, D., Barrett, H., Cagney, J., Clark, R., Fogg, J., Gebhardt, K., Hansen, P., Mitchell, B., and Tippy, D. 1993. Riparian area management: process for assessing proper functioning condition. TR 1737-9. Bureau of Land Management, BLM/SC/ST-93/003+1737, Service Center, CO. 46 pp.

Prichard D., Anderson, J., Correll, C. Fogg, J., Gebhardt, K., Krapf, R., Leonard, S., Mitchell, B., and Staats, J. Riparian area management: a user guide to assessing proper functioning condition and the supporting science for lotic areas. TR-1737-15. Bureau of Land Management, BLM/RS/ST-98/001+1737, Service Center, CO. 126pp.