



Sent via email to <boardofforestry@oregon.gov>

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

June 4, 2019

RE: June 5 Agenda Item 5: Siskiyou Streamside Protections Revision and Decision

Dear Chair Imeson and Members of the Board:

Thank you for the opportunity to provide public comment on Siskiyou Streamside Protections Revision and Decision. I am the staff ecologist with the Klamath Siskiyou Wildlands Center and often assist Rogue Riverkeeper with water quality and fish issues. I have background with conducting fisheries and stream habitat research in Southwest Oregon, conducting numerous contract stream surveys in Oregon and currently monitor and comment on federal timber sales. I urge the Board to adopt measures identified by Rogue Riverkeeper to provide consistency for stream protection in Oregon.

I will briefly review the policy framework responsible for the success of the Northwest Forest Plan to maintain and improve stream temperature. In 1994 the NW Forest Plan was adopted by the Forest Service and BLM. It modified all land use plans from the Mt Baker National Forest in Washington to the Mendocino in California. A single set of Riparian Standards and Guidelines went into effect for all Forest Service and BLM lands. While the forest conditions vary greatly across this vast area, the standards for stream protection were the same. This has proved to be effective policy and greatly simplified management. The Aquatic Conservation Strategy applied to this vast area has withstood the test of time as a model for stream management and restoration.

In 2016 the BLM adopted its own riparian protection standards for Western Oregon. A Resource Management Plans was adopted for northern and coastal districts where moist forests dominate and a separate RMP for the Siskiyou Region where dry forests dominate. However, the management standards for streamside protection are virtually the same. EPA and BLM did an immense amount of stream shade modeling for Western Oregon. In the end the National Marine Fisheries Service made the final regulatory call due to the sensitivity of coho salmon to stream

temperature and large wood. Fish and perennial BLM streams have a 120 ft. no cut buffer of trees >12" dbh. Intermittent and non-fish bearing have a 50 ft no commercial cut buffer.

We have to look at fish biology to put this into context. Rogue fall Chinook are adapted to hot mainstems and warm tributaries because the juvenile Chinook leave the rearing streams by the 4th of July to seek optimum stream temperatures in the Rogue estuary. One reason fall Chinook are thriving is because their offspring do not have to endure streams with elevated summer temperatures and low flows. Even in degraded Bear Creek fall Chinook have made dramatic increases because they only occupy the stream from October to June when stream temperatures are cool. Coho salmon in the Rogue Basin are greatly depleted and federally listed the same as the spotted owl. The coho spawns later than fall Chinook and juveniles must rear one full summer before migrating to the ocean the following spring. Coho are very sensitive to temperature. I have snorkeled numerous streams where coho are abundant in upper reaches but soon dwindle to none in lower reaches that are considerably warmer. Cooling streams by maintaining and improving shade is the single most effective management technique to increase coho abundance. We all want the coho to thrive and be taken off the threatened species list. The shortest and most certain path to that goal is to decrease stream temperatures with increased shade. While forest vegetation and forest management is highly variable across the landscape, the needs of coho salmon for shaded cool streams remain constant throughout their range. This is reflected in federal land management policy for the past 25 years. Uniform standards for stream protection are needed more than ever for private land forestry.

Sincerely,



Richard K. Nawa
Staff Ecologist
Klamath Siskiyou Wildlands Center
PO Box 654
Selma, OR 97538