



June 5, 2019

Tom Imeson, Chair
Board of Forestry

Re: Trout Unlimited Public Comments on Siskiyou Streamside Protections Revision and Decision (Agenda Item 5)

Dear Chair Imeson and Members of the Board,

Thank you for the opportunity to provide public comment today on the Siskiyou streamside protections decision. My name is Chandra Ferrari and I am Senior Policy Advisor for Trout Unlimited (TU), a non-profit organization dedicated to the conservation of cold-water fishes, such as trout and salmon, and their habitats. Trout Unlimited has ten staff members in Oregon who work collaboratively with our 3000 plus members in Oregon and 300,000 members and supporters nationwide. Many of our members call the Siskiyou region home and devote significant time each year to activities to improve watershed health such as tree plantings and habitat restoration.

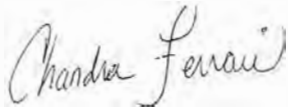
TU strongly supported the Board's efforts in 2017 to finalize the rule requiring increased riparian protections for certain western Oregon streams to meet the Protecting Coldwater Criterion (PCW). The years leading up to the Board's 2017 final rule decision included several severe drought years. Fish kills were recorded in several watersheds due to excessive temperatures and emergency fishing closures were common which negatively affected Oregon's fishing and recreation economy. What was clear then and what is clear now is that such drought events will occur with increased frequency going forward, that climate change is expected to result in continued warming of water in many of Oregon's streams, that lack of streamside vegetation and trees contributes to this warming and that increased riparian buffers increase canopy cover and shade and thus can help improve the resiliency of streams and the fish they support to these effects. What is less clear is why the Board's 2015 decision and 2017 rule excluded Siskiyou streams. The best available scientific information in the record then and now (including Oregon Department of Forestry's (ODF) "RipStream" study (Groom et al. 2011)) demonstrate that logging practices under the existing rules result in warmer streams that violate the PCW and suggest that, if anything, streamside protections are more warranted in the Siskiyou region.

Unfortunately, ODF did not utilize all the best available information to reach the conclusions found in its Systematic Evaluation Report (SER). For example, the final SER excludes the 2011 RipStream study as well as TMDL data from the Department of Environmental Quality (DEQ). Even with these omissions, however, the studies included in the SER demonstrate a direct response to temperature as a result of forest management practices. The SER does not however

demonstrate support for a theory that the relationship between stream warming and shade in the Siskiyou is any different than in the rest of western Oregon.

Accordingly, TU strongly encourages the Board to find that the current streamside rules for small and medium streams in the Siskiyou region do not reliably meet the PCW and are degrading protected water resources. The Board should consider all relevant information including the RipStream study and DEQ stream temperature TMDLs and associated modeling to inform its determination. It is timely to begin the discussion regarding what streamside protections are sufficient to meet coldwater standards and how to ensure those protections are achieved in a robust and equitable manner. However, we will not get to these questions if the Board delays the degradation finding today. The Siskiyou region cannot afford further delay; one important reason is that the Siskiyou region is home to imperiled species including the Southern Oregon/Northern California Coast (SONCC) Evolutionarily Significant Unit (ESU) of coho salmon, listed as a threatened species under the Endangered Species Act. Several scientific reviews have found that current forest practices do not adequately protect coho salmon or their habitats.¹

In conclusion, there is sufficient scientific information in the record to permit the Board to act without delay and make a degradation finding. Thank you for the opportunity to provide comment today and we look forward to working with the Board, the Department and other stakeholders as this process proceeds.



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¹ See Final Recovery Plan for the Southern Oregon/ Northern California Coast Evolutionarily Significant Unit of Coho Salmon (*Oncorhynchus kisutch*). NOAA Fisheries. 2014. P. 3-54