

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

March 7, 2018

**Re: Public Comment on Agenda Item 2: Eastern Oregon/Siskiyou Monitoring Streamside Protections**

Dear Chair Imeson and Members of the Board:

Thank you for the opportunity to provide public comment on Agenda Item 2: Eastern Oregon/Siskiyou Monitoring Streamside Protection. As local landowners and business owners in the Oregon Department of Forestry (ODF) Siskiyou Georegion, we are very concerned that streams in southwestern Oregon continue to be left with weaker protections than the rest of western Oregon. This exclusion means that logging practices that cause stream warming, in likely violation of the Clean Water Act, continue to be permitted in our region.

As local landowners and business owners, we see firsthand the impacts of less protective standards for southern Oregon streams. The Siskiyou Georegion overlaps almost entirely with the streams and smaller rivers that flow into the Rogue River and form the Rogue watershed. The Rogue is a key source of our drinking water, supports our businesses, and sustains populations of salmon and steelhead. However, many streams in the Rogue watershed are already impaired by warm temperatures, which support habitat for threatened populations of coho salmon.

The science is clear that removing trees near streams contributes to warming stream temperatures that harm native fish, including threatened salmon listed under the Endangered Species Act. Current requirements for our region under the Oregon Forest Practices Act often result in harvesting down to the 20-foot no-cut buffer minimum on small and medium fish-bearing streams. Despite multiple findings that these standards are not protective of stream temperature and violate state water quality standards, we're left with a weaker standard than the rest of western Oregon. The need to increase stream protections from logging has been clearly identified by the state's science team and multiple federal agencies.

Under Oregon law, it's the Board's responsibility to establish regulations and best management practices that, to the maximum extent practicable, achieve and maintain state water quality standards. We ask the Board to move forward in approving the monitoring strategy identified under Option 2: Modified Siskiyou Alternative. By approving Option 2, the Board will continue to make progress in addressing inadequacies in current stream buffer standards in the Siskiyou.

Thank you for your consideration of our comments.

Sincerely,

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