

Eastern Oregon/Siskiyou Monitoring Streamside Protections

Testimony by Eric Farm, Southwest Oregon Regional Forest Practice Committee Before the Oregon Board of Forestry – March 7, 2018

Good morning Chair Imeson and board members. My name is Eric Farm and I am here today representing the Southwest Oregon Regional Forest Practice Committee. Our committee is appointed by this board and meets throughout the year, as mandated by law, to assist you in developing, reviewing, and identifying the need for new or amended forest practices rules. Most recently, we have been active in the SSBT and Bald Eagle rule changes.

Based on the extensive time we spent on the RIPSTREAM analysis and subsequent riparian rule changes, we have the following comments on the proposed path forward for a monitoring question in the EO/Siskiyou geographic regions. These comments were reviewed and approved unanimously by our committee.

1. We feel strongly that a robust **compliance audit is critical** to maintaining the public's confidence in the forest practices act, and that funding and resources should not be diverted at its expense.
2. We also believe that a significant investment has already been made in the **RIPSTREAM study** and it **should be completed**. If finishing the LWD portion of the study requires funding and resources, we think that should be prioritized high.
3. Our committee has the following comments on the literature review that will inform a proposed monitoring question.
 - a. **All literature MUST be peer reviewed and published.**
 - i. During the recent riparian rule change, paired watershed research, that hadn't completed the peer review process, was not allowed to be considered. We must have confidence that the research that will determine the need for an expensive monitoring study has been based on strong science and rigorous review.
 - b. The literature used must be **applicable to lands and activities to which the forest practices act applies**, not just linked to the act's goals.
 - i. Land ownership patterns are different in the EO & Siskiyou geo-regions compared to the other four geo-regions.
 - ii. Private land is typically located in lower elevations and subject to different goals and management practices than those of their federal neighbors. Many times, that federal ownership is in large blocks at a higher elevation than parties that are subject to the forest practices act.
 - iii. The federal land in these geo-regions also include within them, areas that are recovering from large wildfires. Results of studies on these lands may not correlate very well to adjacent private land that was salvaged and reforested quickly.

- iv. Studies in a checkerboard ownership (like that of our O&C lands that the BLM manages) that don't look across ownership lines and management practices may not represent private lands very well either.
4. If this literature review should turn into a monitoring question, **we strongly recommend that the study does not look a one single variable, but the whole system**. The entire forest practices act is based on a holistic approach to forest management due to the very complex interactions in our forests. Very rarely is there a single cause/effect in a natural system, and before we make changes, we need to understand what those second and third order effects will be on the system. The preliminary results from the paired watershed studies on the effects of contemporary forest practices on the fish found in headwater streams are good examples of these complex relationships.

The recommendation of the SW Oregon Regional Forest Practice Committee is to implement staff Option 1. We feel that it's important to complete the RIPSTREAM research that is nearly complete and to ensure the compliance audit is robust so that we can provide assurance to the industry and small woodland owners are adhering to the rules at a very high rate.

If the board decides to propose a monitoring question or study, either in addition to Option 1 or in its place, **we recommend the staff monitoring question number 6, Holistic Approach** (Agenda Item 2, Attachment 1, Page 4) using peer reviewed research to inform the monitoring question.

I understand that we are recommending the most complicated and expensive option, but every time we consider making changes to the forest practices act, we need to make sure we are recognizing the complexity of our forest ecosystems. **Rarely are there single cause/effect relationships** on the forest landscape. An observation may have multiple causes and the effects can be both beneficial and detrimental at the same time depending on what single variable you are studying. Without a holistic approach, you could miss the full spectrum of these complex interactions.

Sound science is expensive and requires a public investment, and if we want the forest practices act to continue to be the standard for science based rules, we need to do it right. If this rigorous science leads us to a rule change, it will be received much more positively if we can show that good and thorough science got us there. If cost is considered an obstacle, please communicate that to the public. Our legislature has been very creative in finding funds for critical projects and I'm sure all your stakeholders would unite and lobby them for the best science possible to make sure we do this right.

Your regional advisory committees want to be a resource to you. We have very diverse memberships with representation from the forest industry, small woodland owners and members of the public at large. Please continue to include us as you move forward with these and other questions. By rule, we are your resource to provide clarity, technical feasibility, and practicality on rule changes. We are here to help. Thank you for your time today and for the opportunity share our suggestions with you.