



COLUMBIA RIVER INTER-TRIBAL FISH COMMISSION

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July 21, 2015

Tom Imeson, Chairman
Oregon Board of Forestry
Oregon Department of Forestry
2600 State Street
Salem, Oregon 97310
BoardofForestry@oregon.gov

Dear Chairman Imeson and Oregon Board of Forestry Members:

The Columbia River Inter-Tribal Fish Commission (Commission) was created by and serves the Confederated Tribes of the Warm Springs Reservation of Oregon, the Confederated Tribes of the Umatilla Indian Reservation, the Confederated Tribes and Bands of the Yakama Nation, and the Nez Perce Tribe. As part of its mission, the Commission is charged with helping its member tribes to protect the salmon and lamprey that migrate through the Columbia River and spawn and rear within its interior tributaries.

Attached are the technical comments, of Dale McCullough, Ph.D., Senior Fishery Scientist with the Commission, regarding the review of the action titled "Developing Riparian Rule Prescriptions", which is scheduled for the Board of Forestry (Board) review on July 23, 2015. Included with the comments is a summary of Dr. McCullough's extensive technical background and experience with stream temperature, water quality, fisheries biology (including the relation to temperature and water quality), fish habitat monitoring and cumulative effects of land management on salmon habitat conditions.

Although the action before the Board would apply only to areas in western Oregon (i.e., Coast Range, South Coast, Interior or Willamette Valley, Western Cascades, and Siskiyou), the Commission is concerned with the Board's decision and its future implications on lands in eastern Oregon (i.e., Eastern Cascades and Blue Mountains) where the Commission's member tribes have significant interests. Stream temperatures and riparian protections are important issues affecting eastern Oregon streams and the fish and fisheries they support. The Commission hopes that as a next step, the Board takes a look at the protections afforded to streams and associated habitats in forested lands in the eastern part of the state. However, we are extremely concerned about the science and analyses being implemented in the current review before the Board. We fear that this will lead to bad decisions for Oregon's western forest lands, and that those decisions will be repeated when looking at riparian protections in eastern Oregon.

Thank you for the opportunity to provide this input on your decision. If you have any questions, please feel free to contact Dale McCullough or Christine Golightly at our offices.

Sincerely,

A handwritten signature in cursive script that reads "Babtist Paul Lumley".

Babtist Paul Lumley
Executive Director

Cc: Richard Whitman, Governor's Office, Natural Resources Policy Director
Peter Daugherty, Oregon Department of Forestry, Ex-officio Chief, Private Forests