



Oregon  
Stream  
Protection  
Coalition

Association of  
Northwest Steelheaders

Audubon Society of  
Portland

Cascadia Wildlands

Center for Biological  
Diversity

Coast Range Association

Defenders of Wildlife

Greater Hells Canyon  
Council

Institute for Fisheries  
Resources

KS Wild

McKenzie Flyfishers

Native Fish Society

Northwest  
Environmental  
Advocates

Northwest Guides and  
Anglers

Northwest Sportfishing  
Industry Association

Oregon Wild

Pacific Coast Federation  
of Fishermen's  
Associations

Pacific Rivers

Rogue Riverkeeper

Sierra Club

The Conservation  
Angler

Trout Unlimited

Umpqua Watersheds

Washington Forest Law  
Center

WaterWatch of Oregon

The Wetlands  
Conservancy

Wild Earth Guardians

Wild Salmon Center

**BEFORE THE OREGON BOARD OF FORESTRY**  
*Statement of the Oregon Stream Protection Coalition*  
*Agenda Item 1.A - General Public Comment*  
*7 November 2018*

My name is Mary Scurlock for the Oregon Stream Protection Coalition, an ad hoc 26-member statewide partnership of conservation and fishing industry groups that is currently funded as a project of Wild Salmon Center and Coast Range Association.

Given that the Board is welcoming three new Board members to their first regular meeting, I'd like to take this opportunity to briefly introduce the Coalition and its priorities for 2019.

OSPC formed about six years ago during this Board's long, controversial and sometimes highly technical rule development process that strengthened streamside logging to reduce harvest-induced warming of smaller salmon, steelhead and bull trout streams prohibited by the antidegradation criterion of Oregon's stream temperature standard under the Clean Water Act. Although this process resulted in the first significant change to stream protection under the Oregon Forest Practices Act since 1994, we see our work as incomplete given the majority of stream reaches still in need of additional protection. Our goal is to improve policymaker and public understanding of the importance of further improvements to Oregon's private lands logging and associated practices.

In broad strokes, our 2019 priorities are as follows:

- 1) **Forest Practices Monitoring and Adaptive Policy Change:** We hope the Board will support a continued ramp-up of the Department's monitoring efforts. The central role of private forest practices in the federal disapproval of Oregon's nonpoint pollution plan for the coastal zone and other analysis indicates a that current regulatory baseline cannot safely be presumed sufficient. Increased agency resources are justified to meaningfully evaluate the adequacy of current management practices, and to accomplish the adaptive policy changes needed to meet the Board's mandates at the appropriate scale and within a reasonable timeframe. ODF concurs that resources are currently insufficient to fully meet the agency's monitoring mandate. This Board can help make monitoring and adaptive policy change a high priority.
- 2) **Set a course for a rule change in the Siskiyou Region.** OSPC strongly supports a rule change for salmon, steelhead and bull trout streams and connected upstream reaches in the Siskiyou region. Decisions this Board makes in the Spring of 2019 will determine whether and how the monitoring project currently underway for the Siskiyou results in meaningful policy changes.
- 3) **Focus more attention on headwaters and the adequacy of current rule minimums to protect all smaller streams (not just salmon, steelhead and bull trout reaches) and unstable slopes.** We join the National Oceanic and Atmospheric Administration of the Department of Commerce, the Environmental Protection Agency and many independent scientists and Oregonians in our position that aquatic ecosystems are being degraded by current practices along our smallest streams and on steep and unstable slopes prone to mass wasting are degrading aquatic ecosystems. Reducing road impacts and restoring beaver will also be critical to improving watershed health and resilience to climate change.

- 4) **Work closely with DEQ to identify measures needed to meet temperature and sediment load allocations under water quality restoration plans for streams not meeting standards.** This is an area fraught with policy and legal disconnects between ODF and DEQ, the agencies sharing Clean Water Act implementation authority for nonfederal forestlands. Affirmative validation of whether forest practice rules are actually adequate to meet water quality restoration targets is needed because without this step existing rules are simply presumed valid as a matter of legal fiction. Another issue is whether and how voluntary measures with regulatory backstops can be successfully employed in mapping a path to compliance.
- 5) **Integrate best available science about climate change into all your decisions about management-related risk to public resources.** The past is no longer a fair barometer of future weather patterns, and new uncertainties and extremes must be taken into account in assessing the management-related risks associated with timber harvest near streams and on unstable slopes, as well as in the design of new and reconstructed roads and the remediation of older roads.
- 6) **Consider ESA assurances for aquatic species on nonfederal forests.** We hope this Board will decide tomorrow whether to move forward with a Habitat Conservation Plan for state forestlands. But we also hope you will consider the potential benefits of seeking -- as Washington State has done -- federal assurances for aquatic species under the Endangered Species Act for the state's private forest practices regulatory program.



Mary Scurlock  
For the Oregon Stream Protection Coalition  
503-320-0712  
[Mary.scurlock@comcast.net](mailto:Mary.scurlock@comcast.net)