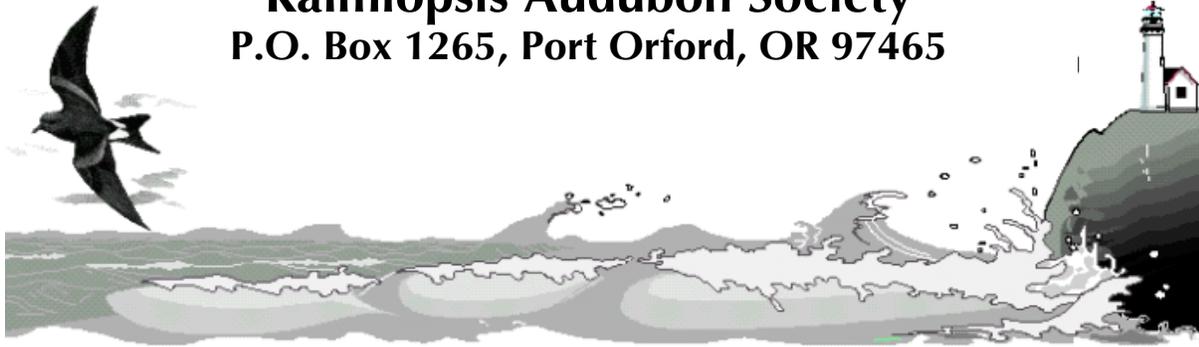


Kalmiopsis Audubon Society
P.O. Box 1265, Port Orford, OR 97465



January 8, 2019

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

Re: Agenda Item 3, Siskiyou Riparian Protection Review

Dear Chair Imeson and Members of the Forestry Board:

I am writing on behalf of the Kalmiopsis Audubon Society. Our group has more than 350 members in Curry County who are concerned about habitat for birds, fish, and wildlife in southwest Oregon. We remain extremely concerned about Oregon Board of Forestry's decision back in 2015 to exempt Siskiyou Mountain streams, especially those in the Rogue River Basin, from the new stream buffer rule. We appreciate that the Board has directed ODF to reconsider this by conducting a Siskiyou Riparian Protection Review.

I'd like to underscore that many rivers in Southwest Oregon are extremely important salmon streams, where countless citizens, local watershed councils, local landowners, local conservation groups have been working to protect and improve water quality and spawning and rearing habitat. Salmon and steelhead and good water quality are central to our communities' way of life and critical for our local economies that depend on sport and commercial fisheries and on recreation. From camping and swimming to fishing and boating, people from all over Oregon --and beyond-- enjoy and benefit from the public values of our rivers, especially those in the renowned Rogue River basin.

Unfortunately, many of these streams, especially small to medium size tributaries, are already under high stress owing to elevated temperature and other water quality problems.

This makes the Siskiyou Riparian Protection Review all the more important and urgent.

Given rising and urgent concerns about how climate change will affect aquatic ecosystems, it's critically important for ODF to include potential impacts of climate change in its review. I've seen reports that predict warmer spring and summer temperatures, increased wildfire activity, reduced precipitation, reduced snowpack, and earlier spring snowmelts for the Siskiyou region. All these changes and disturbances may have a degrading effect on water quality, and relevant science should be considered. I urge the ODF Board to give the Department staff clear guidance to consider scientific research related to potential impacts of climate change in its review.

I also urge the Board to direct Department staff to expand the geographic extent of the review to include western Oregon and northern California in order to include the full range of important research that speaks directly to the policy matters at hand. One such paper is the 2011 ODF study that pointed out the important need for more robust buffers in order to comply with Protecting Cold Water standard of the Clean Water Act (Groom *et al.*, "Response of Western Oregon (USA) stream temperature to contemporary forest management," *Forest Ecology and Management*, 262 (2011), 1618-1629). Although, in many cases, locally-based science may be most relevant, in this case, drawing upon research conducted only within a small region (without the benefit of a university research forest) precludes highly-relevant research that has direct bearing on the policy matters you will need to address.

I also urge the Board to direct the Department to please include DEQ's TMDL and other water quality data as part of its review. This is very relevant local data that should be included.

Most important, I urge that you and other board members to take a fresh look at the need for stronger stream buffers in our region.

In the face of growing stressors to our region's streams, maintaining well-shaded buffer corridors is probably one of the single most important and effective things that we can do to conserve water quality and aquatic life and the many other public values that depend on it. If we as a society are going to protect southwest Oregon's outstanding river and fishery values into the future, the Oregon Department of Forestry will need to play a proactive role.

I thank you for considering our perspective and for your public service.

Sincerely,



Ann Vileisis
President