

May 31, 2019

Chairman Imeson & Board members  
Oregon Board of Forestry  
2600 State St. Salem  
OR 97310

Re: Siskiyou Streamside Protections Revision and Decision

Dear Chairman Imeson:

Please accept the following comments from the Eastern Oregon Regional Forest Practice committee. As you know, Regional Forest Practice Committees are panels of citizens - mandated under Oregon law - that advise the Oregon Board of Forestry on current forestry issues and forest management approaches. The Regional Forest Practice Committees were created by the 1971 Oregon Forest Practices Act. Our committee has been following the work being done by the Department of Forestry (ODF) at the request of the Board of Forestry (BOF) scoping potential monitoring questions relative to riparian standards for the Siskiyou and eastern Oregon regions. As you know, the Department started by conducting discussions about priorities for monitoring, in the form of science reviews or field data collection projects, relating to streamside protections in the Siskiyou and eastern Oregon areas. The goal of the initial assessment was to determine what work should be done to assess whether the streamside protection rules are working to achieve goals for fish and wildlife, water quality and forest health. Our Committee provided input to ODF during this process.

It is important to note that the recent rulemaking for westside stream protection was never meant to apply to the eastside at all and the Board determined it could not extrapolate the science on hand to make an inference to the differing stand conditions and geology of the Siskiyou georegion or eastern Oregon. Having seen no site-specific data collection and research to the contrary, we believe that the current rules for the Siskiyou and eastside georegions were rigorously developed and are very effective in protecting streams.

We would like to offer the following recommendations to the BOF concerning the determination of the effectiveness of streamside protections in the Siskiyou geographic region.

1. The ODF has developed a well-designed decision support document that describes the legal and policy framework, and organizes the evidence and process for reviewing the existing literature appropriate to the Siskiyou georegion. Please direct ODF to continue to use that process and not other processes or methods that are inappropriate for the region.
2. The current ODF review of streamside rules for small and medium fish-bearing streams in the Siskiyou geographic region focuses on goals for protecting stream temperature and desired future condition (DFC) of streamside stands. Those are appropriate. Please direct ODF to

continue with this process and proceed with conducting studies that help to provide answers to these issues.

3. Since the ODF has determined that there is inadequate evidence to decide on sufficiency of these rules in meeting water quality temperature standards and DFC as it relates to stand structure and shade, we support the ODF staff option that the BOF direct ODF to formulate a range of approaches to conducting studies to test sufficiency of these rules for Board consideration. Without new research and georegion site-specific data collection the sufficiency of the current rules cannot be determined conclusively.
4. ODF should continue to use only sound science that is directly related to the Siskiyou georegion. Using scientific studies and/or data collected outside the Siskiyou georegion is not appropriate due to the unique characteristics of the georegion. This is imperative and its importance cannot be overemphasized.

We appreciate the opportunity to provide input to the BOF and would be available for additional questions if needed. We plan to continue our involvement with ODF as new opportunities become available and advise the Board of Forestry on current forestry issues and forest management approaches as directed by Oregon law.

Sincerely,

Robert Messinger  
Chair  
Eastern Oregon Regional Forest Practice Committee

xc: Justice  
Christoffersen  
Abraham