

# **Committee for Family Forestlands**

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To: Oregon Department of Forestry, Board of Forestry  
Subject: Siskiyou Streamside Protection Review

Date: May 31, 2019

Dear Board of Forestry members,

The Committee for Family Forestlands is a standing committee established by the Board of Forestry to assist the State Forester and the Board on issues relevant to some 70,000 family forestland owners in the state, including the formulation of policy and evaluation of effects that changes in forest policy have or will have on those lands. Our Committee has followed the Siskiyou Streamside Protection Review with interest. In March, 2018, John Peel, our Eastern Oregon landowner representative, presented the Committee's recommendation that a review of peer-reviewed publications and research that is found relevant and consonant with the climate, forest types and desired outcomes of the study was a logical and finite first step.

The Committee for Family Forestlands has heard presentations on the implementation of this review. Over the past year, Marganne Allen, Manager of the Forest Health and Monitoring Unit, has provided the Committee with updates as well as the opportunity to discuss and provide input into the review. We have also been able to review the contextual information on fish status and trends in the Siskiyou region provided by ODF&W and water quality status and trends on water temperature by DEQ with their TMDL (Total Maximum Daily Load) procedure.

We feel the systematic review was quite thorough and transparent in examining rule effectiveness relative to stream temperature, desired future condition (DFC) and shade. We understand that at the June BOF meeting, a decision will be made as to whether the rules are working, not working, or there is not enough information currently to evaluate based upon the literature review and corresponding contextual information without new data collection.

Based on the information provided to the Committee we support the Department of Forestry's recommendation that there is inadequate evidence in the current regional field studies from the literature review to decide on sufficiency of the FPA rules in the Siskiyou region in meeting water quality temperature standards and DFC with respect to stand structure and shade.

However, we also feel strongly that the Board of Forestry's range of approaches moving forward utilize the current body of peer reviewed studies establishing the relationship between streamside vegetation and temperature, and that future field studies be designed to adequately prove certainty regarding the rules effectiveness. Additional data collection should also consider the Division's capacity to do further studies, have the funding to do so and be prioritized accordingly.

The Committee for Family Forestlands thanks the Board of Forestry for the opportunity to share our position on the Siskiyou Streamside Protection Review.

Sincerely,

The Committee for Family Forestlands

cc: Tom Imeson, Chair Oregon Board of Forestry  
Peter Daugherty, State Forester  
Lena Tucker, Deputy State Forester  
Kyle Abraham, Private Forests Division Chief