



July 18, 2019

Oregon Board of Forestry
c/o Board Support Office
2600 State Street
Salem, OR 97310

RE: Opposition to Petition for Rulemaking to Identify and Develop Protection Requirements for Coho Salmon Resource Sites

Dear Chair Imeson and fellow members of the Oregon Board of Forestry:

I am a consulting wildlife biologist. I earned my Bachelors of Science Degree in Fisheries and Wildlife Management with a focus on managed forest interactions from Oregon State University in 2000. My professional career focuses on working with landowners to promote sustainable timber harvest. Much of my work is developing and implementing biodiversity management plans for timber companies. Through this effort I work with companies who own timberlands extending through Oregon all the way from Washington to California. All of these lands have fish-bearing streams that provide habitat for coho salmon. In addition, my family owns and manages several forest properties in Oregon. In fact, we have an SSBT stream on our property where we just conducted a thinning project for forest health. I love Oregon, I love working forests and I know that good forest management is the key to healthy fish populations.

It is known that historic forest practices had an impact on coho salmon. I have firsthand experience in working for and with the timber industry; I tell you that current forest practices in Oregon are providing high quality habitat for coho salmon. We have learned from the science and have been practicing forestry that provides for coho since the 1970s. The petition submitted to you claims that private forest lands are managed in a way that doesn't provide for coho habitat. This claim is false. There have been many studies; a 2017 study (Steel et al.) reviewed 490 stream reaches over multiple ownerships and determined that there was little difference. The abundance of juvenile coho salmon was not influenced by land ownership type. Despite the wide, no-touch stream buffers and lack of harvest on federal lands for 10 generations of coho, the density of these fish was found to be no greater than on private forestlands. This is concrete evidence that the forest practices that we use today and have been following since the early 1970s is working to both preserve and recover coho salmon in Oregon.

There are many aspects of stream habitat that are important for coho salmon including the presence of large wood in streams. Growing large wood takes time. In recognition of the time it takes for streamside trees to mature and provide inputs to streams, private landowners have been encouraged to place wood into streams. I work with landowners who embrace the concept of doing the right thing – voluntarily. There are many projects that highlight the contributions from landowners. For example, I work with a private timber company that has over 200 miles of fish-bearing streams on their property. This equates to approximately 3,500 acres of protected buffers. In addition, they have installed nearly 100 fish passable culverts and another 100 bridges. These are all maintained annually to ensure fish passage. And on top of that, they recently participated in a project that increased instream habitat for coho in a 10-mile reach of stream! These projects matter, the way we manage our forests for fish matter. Forest landowners in Oregon take this seriously and are already managing in a way that protects coho and other fish in Oregon streams.

There is no justification for the petition before you. Fish, especially coho salmon, are synonymous with Oregon. Protecting habitat for these iconic species is a fundamental part of forestland management. Contemporary forest practices administered by the Oregon Forest Practices Act helps forest landowners provide habitat for salmon within healthy forests. The forest industry is highly committed to implementing the FPA. We have a long history of funding research about forestry and the effects of forest management on fish and water quality.

Since 1997 private forest landowners in partnership with government agencies, watershed councils and private citizens have contributed over \$1 billion toward restoration activities that benefit fish passage and habitat in Oregon. It is important to note that this work is all completely voluntary, beyond regulation, and illustrates how important fish habitat is to Oregonians. As forest landowners, we work, we play, we fish, and we live in the forest ecosystem. We work every day to provide habitat for salmon and healthy forests for now and into the future.

I strongly urge you to unequivocally reject the petition for rulemaking to identify and develop protection requirements for Coho Salmon Resources Sites. Forest landowners are already working cooperatively with watershed councils and others to improve habitat for coho salmon. We've been doing this since 1997 and it's working.

Thank you



Fran Cafferata Coe, CWB®
Cafferata Consulting, LLC
Oregon Small Woodland Owner