

Oregon Board of Forestry
2600 State Street
Salem, OR

September 3, 2019

Re: Siskiyou Streamside Protections Review

Audubon Society of Lincoln City is a conservation and education organization that exists to encourage residents and visitors to protect and enjoy native wildlife and habitats found on the Central Oregon Coast. Our geographic footprint includes Lincoln and Tillamook Counties but our vision is for responsible stewardship of all wildlife and habitat from the peaks of the Coast Range to the farthest reaches of the Territorial Sea.

Respectfully we ask that the Oregon Board of Forestry:

- 1) Direct ODF staff to conduct the Literature Review Option 1(a).
- 2) Finalize a joint monitoring plan with DEQ within 90 days.
- 3) Implement Climate Change Option 1.
- 4) Reject the proposed creation of another Advisory Committee.

In June Department staff were directed to 1) work with DEQ to flesh out existing information on TMDL's and 2) to look for additional ways to meet the ODF's responsibility for monitoring stream conditions so that the Board can make an informed decision on the sufficiency of stream protections. The recommendations presented by staff for the September 4 Board meeting do neither.

To the first point: once again, Ripstream temperature studies are dismissed without justification other than the Board is unlikely to consider them relevant. This is illogical in light of Board members repeated requests for an expansion of the literature review. To the second: Engagement with DEQ on monitoring options is postponed until sometime in the future. This timeframe is not necessary and looks very much like a stalling tactic. A list of options has already been identified, and decisions about which to include can be made now.

ODFW tells us the existence of our salmonids are threatened. This existential threat has been known for 20 years. Recovering these species will require aggressive actions to protect their spawning habitats. DEQ data tells us our stream temperatures are too high and are likely to increase. Our stream protections then cannot then be sufficient. As atmospheric temperatures rise, shade is the single most important factor over which we have near total control. We need more shade. We need larger buffers.

Failing to address the effects of climate change specifically as they appear in the Siskiyou when considering the sufficiency of our rules is unconscionable. Southern Oregon is warming at a faster rate than any other region in the state. It makes sense to incorporate climate change effects into the Siskiyou project first. This does not and should not preclude a more comprehensive FPA review in the near future. Include climate review in the Siskiyou rule sufficiency analysis now. It is the fastest warming region in the state so a sufficiency determination there is more time-sensitive and thus too important to wait until a more comprehensive review can be completed. This work will pay dividends by allowing leverage of experience and data. Beginning work in the most severely impacted region would allow for a more informed analysis in those that are changing more slowly. Land use decisions can and will have a greater impact on global warming than any carbon control mechanism. You have the capacity to do more to control warming and mitigate its effects than any other authority in the state.

Finally, Department staff have presented a cynical recommendation to form a stakeholder advisory committee before completing their charge to expand the information available to the board. You need only look at the very heavy pressure applied by the FTLAC, the regional forest practices committees, the OFRI and the OFIC to realize “stakeholders” **are** already, and will continue to be deeply engaged in efforts to control the information you, the Board need for decision-making.

Respectfully prepared and submitted by

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ASLC Conservation Action Committee