

Further Direction Needed. We concur with the staff report that Board direction is needed to “on the specific monitoring question and the type and level of detail (monitoring or research evidence) desired to inform Board action for the eastside and the Siskiyou” and that “the Board has not yet undertaken this level of focus on this topic.” To the extent that this implies that the Board should consider focusing on questions other than whether current rules meet the PCW, we would concur only if those questions would essentially subsume the narrow issue of harvest-related stream warming in a broader focus on the totality of riparian functions. It is not acceptable to consider setting aside the issue of PCW attainment.


The Board should not take staff references to data in SER to mean that we know virtually nothing about stream warming in the Siskiyou and EaStern Oregon. The staff report notes that in the recent “systematic review of literature that contained primary measurements of stream temperature, riparian shade, or a proxy of the latter” completed in January 2013, found “no relevant studies in the Siskiyou region.” But this statement applies to the very narrow definition of “relevant” chosen by the SER review. This does not mean for example, that the RipStream study itself is not relevant to the issues before the Board.

The staff goes on to say that “[w]ith the Board’s November decision not to extend the riparian rule results to the Siskiyou region, the department does not have temperature monitoring evidence related to forest practices in that region.” This could be misinterpreted. The lack of ODF monitoring sites in the region does not mean that those data are not relevant and could not have been reasonably extrapolated to support a rule change or that there is not other information that supports such extrapolation.

Timing of potential policy change in Siskiyou v. Eastern Oregon. The staff materials seem to imply that the Board has decided to address riparian matters for eastern Oregon and the Siskiyou together. We urge the Board to defer this important policy decision, recognizing that the Siskiyou is part of the Coastal Zone and inaction here relates directly to the current coastal nonpoint plan disapproval by NOAA and the loss of federal funding. Given that the Siskiyou was only dropped from the pending riparian rule a few months ago, there was a period of several years during which the Board was operating under a finding of resource degradation that included this region.

Resources for Adaptive Management. We are concerned that the Department lacks adequate resources to avoid the kinds of tradeoffs before you today. I hope we can find ways to work together in the future to help alleviate this problem.

Sincerely,



Mary Scurlock
Coordinator
Oregon Stream Protection Coalition