



~ Protecting clean water and fish in the waters of the Rogue

Thomas Imeson, Chair
Oregon Board of Forestry
2600 State Street
Salem, OR 97310

January 3, 2018

Re: Public Comment on Agenda Item 7 Eastern Oregon/Siskiyou rule review - update

Dear Chair Imeson and Members of the Board:

Thank you for the opportunity to provide public comment on Agenda Item 7: Eastern Oregon/Siskiyou rule review update. On behalf of our more than 3,500 members and supporters, we ask the Board of Forestry (BOF) to continue to prioritize addressing stream buffer protections in the Siskiyou region to prevent violations of the Protecting Cold Water (PCW) criterion and to mitigate impacts to salmonid species protected under the Endangered Species Act. The exclusion of the Siskiyou and eastern Oregon from the new stream buffer rule is a serious concern given the compelling evidence that existing rules were inadequate to prevent logging that warms water temperatures in violation of the Protecting Coldwater Criterion ("PCW"), a fundamental component of the state's water quality standard for stream temperature.¹

In the November 2017 Board of Forestry (BOF) meeting, the Board directed Oregon Department of Forestry (ODF) staff to develop potential monitoring questions regarding streamside protections in the Siskiyou and eastern Oregon and to develop a timeline and estimate of resources required by the July 2017 Board meeting. We are concerned that the development of these monitoring questions is behind schedule and that the scope for the monitoring questions has expanded significantly beyond addressing compliance with the PCW for small and medium fish-bearing streams in the Siskiyou and eastern Oregon.

Specifically, we ask that ODF identify potential monitoring questions that would provide the information and analysis required to extrapolate the RipStream findings to the Siskiyou and eastern Oregon. Monitoring questions should specifically address compliance with the PCW for small and medium fish-bearing streams in the Siskiyou and eastern Oregon. We ask that ODF move forward to establish some baseline temperature monitoring, based on the RipStream study design, and to use the preliminary GIS analysis to identify appropriate field sites. This will provide critical data to inform subsequent monitoring and analysis. ODF should also move forward to synthesize the

available data and existing scientific literature related to stream temperature, forest practices, and water quality in the Siskiyou and eastern Oregon. The “Protecting Coldwater for Salmon and Steelhead on Private Timberland Streams of Oregon’s Siskiyou Region: A Synoptic Scientific Look at Stream Warming, Shade, and Logging” report prepared for the Oregon Stream Protection Coalition by Dr. Christopher Frissell and Richard Nawa provides a synthesis of the scientific literature related to this issue in the Siskiyou region.² This report finds no scientific evidence that the relationship between stream temperature and shade is any different in the Siskiyou region than it is in western Oregon. The ecological differences that exist between the Siskiyou region and western Oregon have a minimal effect on that relationship. In fact, the science indicates that small and medium streams in the Siskiyou may actually be more sensitive to temperature changes from changes in shade.

In conclusion, we respectfully request that ODF develops specific monitoring questions with a clear implementation timeline to address compliance with the PCW for small and medium fish-bearing streams in the Siskiyou and eastern Oregon.

Sincerely,

Stacey Detwiler
Conservation Director
Rogue Riverkeeper

¹ Groom et al. 2011. *Response of Western Oregon (USA) stream temperature to contemporary forest management*, Forest Ecology and Management, 262: 1618-1629.

² Frissell, Christopher A. and Richard K. Nawa. 2016. Protecting coldwater for salmon and steelhead on private timberland streams of Oregon’s Siskiyou region: A synoptic scientific look at stream warming, shade, and logging. Prepared for the Oregon Stream Protection Coalition. Available online < https://www.oregon.gov/ODF/Board/Documents/BOF/20161102/BOFMIN_20161102_MaryScurlock_Agenda%20Item%207_07.pdf >.