



BEFORE THE OREGON BOARD OF FORESTRY

Statement of Mary Scurlock
Re: Agenda Item 2 Private Forests Water Quality
Oregon Stream Protection Coalition

Association of Northwest
Steelheaders

Audubon Society of
Portland

Cascadia Wildlands

Center for Biological
Diversity

Coast Range Association

Defenders of Wildlife

Greater Hells Canyon
Council

Institute for Fisheries
Resources

KS Wild

McKenzie Flyfishers

Native Fish Society

Northwest Environmental
Advocates

Northwest Guides and
Anglers

Northwest Sportfishing
Industry Association

Oregon Wild

Pacific Coast Federation
of Fishermen's
Associations

Pacific Rivers

Rogue Riverkeeper

Sierra Club

Trout Unlimited

Umpqua Watersheds

Washington Forest Law
Center

WaterWatch of Oregon

The Wetlands
Conservancy

Wild Earth Guardians

Wild Salmon Center

The Oregon Stream Protection Coalition supports the staff recommendation to move forward with the "Modified Siskiyou Alternative," but we further urge the Board to recognize that there is reason to be concerned about whether the Board is meeting its obligations to protect and monitor aquatic resources in Eastern Oregon.

Available information supports an equally pressing need for adaptive management attention to Eastern Oregon as to the Siskiyou. There is not sufficient evidence that reliance on voluntary measures alone is an adequate approach.

Many Eastern Oregon streams are impaired for parameters associated with forest practices: at least 68% of streams that pass through private forestlands in the Eastern Cascades region are listed for temperature/sedimentation/turbidity, and at least 64% for the Blue Mountains region. (EPA 2017).

We also know from research that stream temperatures in the Grande Ronde Basin of northeast Oregon are limiting overall summer density and abundance of juvenile steelhead and chinook salmon, that increased stream shade can produce significant reach-scale stream cooling that directly benefits salmonids, and that thermal refugia associated with cold tributaries and groundwater upwelling sites help sustain juvenile salmonids during the warmest hours of the day in mid summer. (Ebersole et.al. 2003). Overall, existing information indicates that: 1) under prevailing conditions, any loss of shade is likely to translate into lost fish population abundance and productivity, 2) warming of tributary streams resulting from forest thinning in near-stream areas likely harms salmonids in receiving waters, and 3) improvements in riparian shade cover can be expected to benefit salmonid populations.

The high resource risk associated with current stream protection rules in Eastern Oregon, particularly in a changing climate, justifies inclusion of these ODF regions in monitoring efforts as soon as resources allow. Regardless of when a monitoring program effort is initiated for eastern Oregon, we hope dialogue about these issues will continue at the Board level.

Enclosures:

(1) Memo from Mary Scurlock to the Oregon Board of Forestry Re: Information relevant to the need for adaptive change to riparian protection on private forestlands in Eastern Oregon . 13 pp.

(2) EPA Region 10. 2017. Memorandum from Peter Leinenbach, R10 EPA to Alan Henning, R10 EPA Re: River distance associated with 303d segments with temperature/sedimentation/ turbidity listings within the Rogue/Siskiyou, and Blue Mountain assessment areas in Oregon. 3 pp.