

Siskiyou Streamside Protections Review

**Testimony by Dave Erickson, Southwest Oregon Regional Forest Practice Committee
Before the Oregon Board of Forestry – June 5, 2019**

Good morning Chair Imeson and board members. My name is Dave Erickson and I am here today representing the Southwest Oregon Regional Forest Practice Committee. Our committee is appointed by this Board and meets throughout the year, as mandated by law, to assist you in developing, reviewing, and identifying the need for new or amended forest practices rules. I am here today to give testimony to the Siskiyou Streamside Protections Review. These comments were reviewed and approved by our committee.

The recommendation of the SW Oregon Regional Forest Practice Committee is to implement the ODF staff recommendation of “Not enough information for sufficiency decision: Additional study prioritized”. There is inadequate evidence to decide on the sufficiency of the Forest Practices Act rules for clearcut and thin harvest prescriptions on small and medium fish bearing streams in meeting water quality temperature standards or desired future conditions as it relates to stand structure and shade in the Siskiyou region. The Department should formulate an approach to conducting studies to test the sufficiency of the Forest Practice Act rules for the Siskiyou region.

It is important to remember that ODF has identified 7 geographic regions because of their diversity. The Siskiyou is different from the Eastern, Cascade, Interior and South Coast regions. The Siskiyou region is recognized as being different because, it is.

The results of the recently completed literature review showed only 13 studies that were relevant to either water quality temperature or desired future conditions as they relate to the Forest Practices Act. The results of those studies did not provide a confidence for or against the sufficiency of the existing Forest Practices Act rules in relation to water quality temperature or desired future conditions.

The SW Regional Forest Practices committee spent extensive time and effort reviewing the RIPSTREAM analysis and supporting subsequent riparian rule changes for the Coast Range, South Coast, Interior and West Cascades Geographic Regions. This support for rule changes, many of which were adopted by the Board in the final rulemaking, was a result of available science. We did not support riparian rule changes to the Board for the Siskiyou region because no monitoring data was available from this region.

The Board purposefully did not extrapolate data to the Siskiyou region when riparian management rulemaking was adopted for the other regions where data was collected. There is no compelling evidence in the recently completed literature review to change this position by the Board and to implement rulemaking changes without further studies. To implement rule

changes without first completing monitoring studies will move away from the process of letting sound science determine best management practices as it relates to the Forest Practices Act.

I understand that we are recommending an expensive option, but every time we consider making changes to the Forest Practices Act, we need to make sure we are basing our changes on sound science. Sound science is expensive and requires a public investment, and if we want the Forest Practices Act to continue to be the standard for science based rules, we need to do it right. If this rigorous science leads us to a rule change, it will be received much more positively if we can show that good and thorough science got us there. If cost is considered an obstacle, please communicate that to the public. Our legislature has been very creative in finding funds for critical projects and I'm sure all your stakeholders would unite and lobby them for the best science possible to make sure we do this right.

If the board decides to propose monitoring studies, water quality temperature and desired future conditions are appropriate areas of emphasis. Water quality temperature science helps us have confidence from our EPA and DEQ partners and desired future conditions studies will help guide us to long term health of our riparian management areas. Areas of emphasis in the desired future conditions studies could be shade and large woody debris.

Your regional advisory committees want to be a resource to you. We have representation from the forest industry, small woodland owners and members of the public at large. Please continue to include us as you move forward with these and other questions. By rule, we are your resource to provide clarity, technical feasibility, and practicality on rule changes. Thank you for your time today and for the opportunity to share our suggestions with you.