



NATIVE FISH SOCIETY

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June 4, 2019

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

From: Mark Sherwood, Executive Director
Jake Crawford, River Steward Program Director
Conrad Gowell, Fellowship Program Director
Charles Gehr, Rogue River Steward
Bryan Sohl, Rogue River Steward
Rachel Andras, Bear Creek Tributaries River Steward
Jim Andras, Bear Creek Tributaries River Steward

Re: Agenda Item 5 - Siskiyou Streamside Protections Revision and Decision

Thank you for the opportunity to submit comments regarding the Board of Forestry's Agenda Item 5 concerning Siskiyou Streamside Protections Revision and Decision. Native Fish Society (NFS) is a grassroots, conservation non-profit that utilizes the best available science and cultural wisdom to advocate for the protection and recovery of wild, native fish and promote stewardship of the habitats that sustain us all. NFS supports over 90 place-based River Stewards who safeguard their homewaters across the Pacific Northwest, and their advocacy is enhanced by skills-based Fellows who use their expertise to advance our shared vision.

We are writing out of concern for the wild, native fish who inhabit the rivers and streams of the Siskiyou Region in southwest Oregon. The Siskiyou Region provides important habitat for our region's iconic native fish species that include sensitive and threatened populations of Coho salmon, spring and fall Chinook salmon, summer and winter steelhead trout, cutthroat trout, redband trout, and lamprey.

There is sufficient evidence that current stream buffer protections are inadequate for protecting water temperatures suitable for native fish in the Siskiyou Region.

Research has demonstrated that removing trees and vegetation near streams can increase water temperature and vegetation that create shade and keep streams cool for fish. The Oregon Department of Forestry's "RipStream" study (Groom et al. 2011), found that logging practices under the existing rules resulted in warmer streams, which is in violation of the Protecting Coldwater Criterion under the state's water quality standards for temperature. Further, the state's Systematic Evidence Review (SER) has demonstrated a direct response to stream temperature from current management practices. Importantly, when paired with the findings from "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" by Fissell and Nawa (2016), the scientific literature does not demonstrate a relationship between stream warming and shade in the Siskiyou as any different from the rest of Western Oregon, where stronger stream protections are afforded from the 2017 Board of Forestry stream buffer rule.

It is also well documented that the unique and diverse habitats in the Siskiyou Region already experience conditions that tend to be warmer and drier than other parts of western Oregon. In the Board's meeting materials, the Oregon Department of Fish and Wildlife identified stream temperature as a limiting factor for fish populations in the Siskiyou Region, which affects their productivity and ability to survive. Further, a 2004 Independent Multidisciplinary Science Team (IMST) report stressed the importance of riparian shade and its significance to stream temperature.

Of all the factors that affect salmon and trout biology, water temperature is arguably one of the most important environmental influences. Water temperature impacts nearly every phase of their life, including metabolism, migration, spawning, rearing, swimming speed, and gives them a competitive advantage over other predators (USEPA, 2001).

We request that you consider the significant body of scientific literature that addresses the importance of maintaining adequate stream protections and their contribution to suitable water temperatures for sensitive and threatened salmonids in the Siskiyou Region, including the RipStream Study, all related administrative documents, Oregon Department of Environmental Quality stream temperature TMDLs, and associated modeling. Ultimately, we want to ensure that the Board of Forestry rules are aligned with the water quality standards in accordance with the Clean Water Act, and ensure that our region's iconic native fish populations are abundant and resilient to meet the challenges of a changing climate.

NFS submits these comments in support of the comments submitted for the record by Rogue Riverkeeper and the Oregon Stream Protection Coalition. On behalf of our members, supporters, and River Stewards with homewaters impacted by the current policy, we respectfully request that you review the evidence supporting the assertion that current stream buffers are

inadequate and move forward with a rule-making process to improve stream buffer protections for the Siskiyou Region.

Thank you for your consideration of this important request.

Respectfully,

Mark Sherwood, Executive Director
Jake Crawford, River Steward Program Director
Conrad Gowell, Fellowship Program Director
Charles Gehr, Rogue River Steward
Bryan Sohl, Rogue River Steward
Rachel Andras, Bear Creek Tributaries River Steward
Jim Andras, Bear Creek Tributaries River Steward

Literature Referenced:

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

Frissell, Chris and Rich 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.

Independent Multidisciplinary Science Team. 2004. Oregon's Water Temperature Standard and its Application: Causes, Consequences, and Controversies Associated with Stream Temperature. Technical Report 2004-1 to the Oregon Plan for Salmon and Watersheds, Oregon Watershed Enhancement Board, Salem, Oregon, p. 8.

United States Environmental Protection Agency (USEPA). (2001). Issue Paper 5: Summary of technical literature examining the effects of temperature on salmonids. Region 10, Seattle, WA. EPA 910-D-01-005. 113pp. Available online at: <<http://yosemite.epa.gov/R10/water.nsf>>.

