

Committee for Family Forestlands

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March 18, 2015

Tom Imeson, Chair
Oregon Board of Forestry
2600 State Street
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RE: Protection Standards on Small and Medium Fish Bearing Streams

Dear Chair Imeson and Board Members:

The Committee for Family Forestlands* (CFF) has previously communicated to the Board of Forestry (BOF) regarding protection standards on small and medium fish bearing streams. This issue continues to be at the forefront of family forestland owners' concerns and, as a result, CFF will continue to provide the Board with information we feel pertinent to your current rule making process. Because of their often smaller size and lower elevation in the watershed where stream sizes are larger, family-owned forestlands have a unique perspective and exposure to riparian rules and are often subject to the most rigorous end of the spectrum of riparian regulation.

It's important to keep in mind that reduced harvest revenues can lead to negative environmental consequences. Family forest owners already face significant challenges in making actively-managed forests economically viable. Small forests that do not return an economic benefit are more likely to be converted to other uses and are subject to fragmentation if inheriting generations find little economic value in forestry.

We believe, however, that it is essential the BOF clearly understand not only the impacts any new rule may have on family forest owners' ability to keep their lands in forestry but also the outstanding efforts that have been made by private forestland owners in the State of Oregon to address issues affecting riparian areas and associated outcomes.

Private landowners have contributed millions of dollars for research in paired watershed studies to learn about the impacts of forest management activities on our aquatic systems. These paired watershed studies have shown forest management activities conducted in accordance with the current Forest Practices Act have little impact on fish and, more times than not, the impacts are positive on fish abundance and fish biomass.

Private landowners have made tremendous investments to improve the water quality in Oregon. Since the adoption of the Oregon Plan for Salmon and Watersheds in 1997, the Oregon Watershed Enhancement Board data from landowners show that contributions made to Oregon streams include 3,130 stream crossings fixed or upgraded, 9,211 miles of road improvements, 18,505 surface drainage improvements, 569 large wood placement projects and 6,300 miles of riparian habitat. Private landowners have contributed more than \$96 million dollars to the cause.

These activities are continuing today. One example, the Umpqua Fish Enhancement Derby in Roseburg, has contributed over \$1.16 million toward stream enhancement and restoration projects over the past 22 years, all as matching funds to stretch dollars. Another example of efforts to protect our natural resources is The Associated Oregon Loggers' professional logger program, which trains loggers in best management practices, focusing on practices that protect our forest resources.

The outcomes from these efforts have been positive, confirmed by trends in fish populations. For example, the attached graph from the Oregon Forest Resources Institute uses Oregon Department of Fish & Wildlife data to display population trends for Coho Salmon in coastal watersheds from 1950 to 2014. This graph clearly shows the positive outcomes from private landowner and public efforts.

We believe this information suggests the following:

1. Private landowners have displayed, by their huge contributions in research and on-the-ground stream restoration activities, that they are committed to improving water quality, riparian areas and fish habitat.
2. The current Oregon Forest Practices Act and the Oregon Plan, which is based on volunteer efforts, are working well as evidenced by both the findings in the paired watershed studies and fish population trends.

We also note that no rule-making by any single Oregon agency can resolve all issues impacting fish and water quality. The FPA cannot control many of the most severe habitat impacts. Simplified lower river channels that diminish Coho rearing and shelter habitat will not, for example, be corrected by wider buffers. Water quality and aquatic life may be best served by pursuing a holistic, multi-agency strategy.

The CFF will continue to review solutions proposed to the BOF. We look forward to participating with the Board in future discussions regarding forests and water quality in general, the role family forestlands play in maintaining Oregon's forest landscape, and policy issues specifically related to the clean water standards.

Sincerely,
Committee for Family Forestlands


Susan Watkins, Acting Chair

cc: Oregon Board of Forestry Members
Doug Decker, State Forester

Attachment (2) : Spawning Coho Salmon in Oregon's Coast Watersheds graph

* The Committee for Family Forestlands is a standing committee established by the Board of Forestry to assist the State Forester and the Board of Forestry on issues relevant to some 70,000 family forestland owners in the state. Our committee is made up of family forestland owners from different regions of the state, environmental organization and forest industry representatives, a citizen-at-large and ex-officio members representing the Oregon State Forester, Oregon State University College of Forestry, Oregon Forest Resources Institute, the United States Forest Service, small forestland owner groups, and forestry interest/consulting groups.