



Providing Opportunity to Family Forestland Owners

Board of Forestry – April 22, 2015

Testimony of Jim James, Executive Director, Oregon Small Woodlands Association

As the Department of Forestry and Board of Forestry works to find a scientific solution to a perceived stream temperature problem based solely on a policy developed with no scientific justification, OSWA believes it is important for the Board to remember what science is available to tell us about Oregon's forest streams. You have heard this all before, but I think it is worth repeating.

- There is no science that supports the very strict 0.3 degree Celsius threshold in the Protecting Cold Water Criteria. None. It does not exist. Nowhere in scientific literature is the 0.3 degree Celsius threshold found as the magic number nor is there any scientific evidence that a minor temporary increase in temperature causes any harm at all to the beneficial uses of a forest stream.
- Paired Watershed studies clearly show that when small and medium fish bearing streams are harvested with the maximum tree removal in the current FPA rules the minor and temporary increases in stream temperatures cause no harm to fish and the minor increase quickly dissipates downstream.
- Scientists tell me I cannot say the minor temporary increase is beneficial to fish. I am told such a statement lacks the scientific vigor needed to make that claim. But those same scientists tell me claiming no harm to fish is valid. Common sense tells us when fish have more food because the stream conditions improve the habitat for the critters fish eat and there are larger populations of fish and the fish there are bigger that has to be good for those fish.
- The beneficial use of forest streams is fish not avoiding minor deviations in stream temperature that actually occur naturally anyway.

When it is time to make a decision, please use common sense on what is needed to protect the beneficial use of forest streams and do not forget the impacts to forest owners should such a rule over step what is really needed to protect that beneficial use.

Oregon Small Woodlands Association 187 High Street NE, Suite 208, Salem, OR 97301
Phone: 503.588.1813 - Fax: 503.588.1970 – Web: www.oswa.org