



Oregon State Board of Forestry

June 3rd, 2015

We write on behalf of Trout Unlimited (TU) and our 3,000 Oregon members to provide comments on the Oregon Board of Forestry Riparian Rule Prescriptions. These rule prescriptions will have a significant impact on cold water fisheries in Oregon. For decades, Trout Unlimited and its members in Oregon have invested time and money into protecting, reconnecting and restoring cold water fisheries crucial to our economy and way of life as Oregonians. We appreciate your efforts to balance the needs of private timber land interests with the need for cold, clean water necessary to Oregon's populations of salmon, steelhead and trout. The social and economic value to our members and all Oregonians of these populations of salmonids cannot be overstated. We offer the following comments in hopes that the Board of Forestry will adopt rule changes that will follow your own science and provide sufficient streamside buffers to cool water temperatures and improve habitat for a variety of fish species.

We recommend 110 foot, no-cut riparian management areas. This expanded buffer rule should include all fish-bearing streams in western Oregon. Additionally, we recommend that the board commit to appropriate, protections from harvest-related stream warming in all fish bearing streams in Eastern Oregon and on ALL non-fish bearing streams in Oregon within twenty four months.

The department's analysis shows that the PCW (protecting cold water) criterion would be met 100% of the time with a 120 foot no-cut buffer, but the Board chose not to consider this prescription as it is outside the "bookends" established by the board before any quantitative analysis had begun. Under Oregon's Administrative Rules it is the board's duty to establish and retain vegetation adequate to provide aquatic habitat components and functions such as shade, large wood and nutrients. It is our position, that based on your own analysis and your accountability to the public for your decisions, keeping the PCW at near optimum levels requires the 110 foot, no-cut buffer.

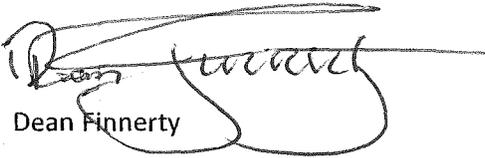
We would also like it noted that the cumulative effect of water temperatures begins well above stream reaches where populations of SSBT (salmon, steelhead, bull trout) are found and that many other important species will be affected by the board's decision. In particular, coastal cutthroat trout, including sea-run populations, and resident redband trout often occupy waters upstream of salmon and

steelhead populations. We believe that ALL cold water species of salmonids in Oregon and their preferred habitat should be considered equally.

A variety of valuable ecosystem services flow from functional stream systems and intact riparian buffers. These include; increased fish production, increased recreational opportunities, flood protection, quality drinking water, erosion control and soil retention and many others. With current trends in climate change, these services increase significantly. Functional stream systems require less investment in restoration efforts. As state agencies continue to be tasked with doing more with less, the value of common-sense riparian buffers along our streams makes even more sense economically; it's far easier and less expensive to protect riparian zones as they are than undertake costly repairs using taxpayers' money after the damage has been done.

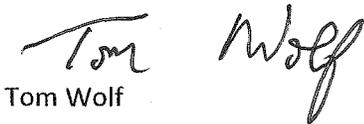
Shade provided by streamside trees helps keep water temperatures cool. Cool, clean water benefits not only humans in a variety of ways, but also salmon, steelhead and many varieties of trout. Additionally, many amphibians and other sensitive species require the cooler, shaded areas along our streams and rivers and would also benefit from an increased riparian buffer. Trees left along streams ultimately end up providing habitat for a variety of species and improved habitat within the stream by mitigating high water events and improving gravel recruitment for spawning. Oregon's forestry rules fall far short of our neighboring states rules. The science is clear that by increasing Oregon's riparian buffers, our rivers, streams, cold water fishes and the Oregonians who enjoy them will all benefit.

Respectfully submitted,



Dean Finnerty

Trout Unlimited/Sportsmen's Conservation Project



Tom Wolf

Executive Director, Oregon Council of Trout Unlimited