



Providing Opportunity to Family Forestland Owners

July 23, 2015

Oregon Board of Forestry
Chair Imeson, Board Members and State Forester Decker:

I am **Rick Barnes**, a forestry consultant, a small woodland owner and Oregon Small Woodland Association's Chair-Elect. I have closely followed the riparian issues, realizing the tremendous impact your decision could have on my clients and OSWA members.

I will focus on two issues; the comparison of Oregon rules to other states and my concern about the model being used for analysis purposes.

Washington and California forest riparian rules are often mentioned as good examples of riparian protection by the federal government and organizations opposed to harvesting trees. Washington's Forest & Fish legislation in 1999 was driven by the federal government without scientific justification. This failed policy has cost family forest owners over **\$2 billion** with nothing to show for it. There is no evidence fish in Washington are faring better than fish in Oregon. We have had the current riparian stream rules for 20 years and we are experiencing record runs of Coho.

In California, the forestry rules are so onerous, many are converting their family forestland to other uses. These forest owners paint a dire picture of forest regulatory challenges based on poor policy, not science.

The policies in California and Washington have added layers of regulation and costly burdens to forestland owners with no sign of benefit. Their policies are based on misplaced emotional rhetoric rather than solid science. Look to the Paired Watershed Studies results for science based answers. Do not import our neighbor's failed policies to Oregon.

Finally, a comment about the model being used for analysis. I was project manager for the Draft Management Plan for the John Day Subbasin. Tremendous effort was made by the 17 agencies and organizations working on the plan development and in preparing data to input into a model to set priorities. The data was processed and the model results indicated some streams were unsuitable for fish. This was obviously inaccurate; we had actual fish surveys showing substantial fish populations. These inaccurate model results took the energy out of the group and many lost faith in the process.

I see similarities with the current ODF model. It does not come close to emulating reality. The model shows a need for 90 feet of no-cut buffer to obtain results similar to the Ripstream private site averages; averages which used standards with maximum buffers for small streams of 50 feet and 70 feet for medium streams. The model continues to be used despite the fact these inconsistencies have been pointed out repeatedly by a variety of specialists. We need to step back and focus on the detailed paired watershed studies that focus on the biology of fish and other organisms rather than use a model that clearly ignores realistic science.

Don't take the wind out of the sails of the great research and stream improvement projects that are being done by Oregonians who care deeply about their forestland. Set policy that utilizes these valiant efforts, not ignores them. Thank you for the opportunity to comment.

Rick Barnes, OSWA President-Elect