



To: The Oregon Board of Forestry
From: Bob Van Dyk, Wild Salmon Center
Re: Riparian Protections
Date: July 23, 2015

My name is Bob Van Dyk, and I work for the Wild Salmon Center, a conservation non-profit headquartered in Portland, Oregon.

We encourage you to direct rulemaking for 100-foot stream buffers that are either no-touch or require a very high level of retention. The scientific record shows that such buffers are needed to confidently meet the Protecting Cold Water standard. We ask that these buffers be applied to all of Western Oregon, and recommend extending the buffers to all fish-bearing streams.

In addition to benefits of cold water that increased buffers will provide, the record also shows that 100-foot buffers would significantly improve the level of wood recruitment to streams. Though wood recruitment is not the driving factor for this rulemaking, it is an important secondary benefit that would be attained. As you know, many important salmon streams are severely short of wood. Some locations, like the northern Coast Range, show continuing decreases of large wood despite active restoration efforts. To ensure sufficient wood over time, we need the larger buffers under consideration today.

When considered in the broader landscape context, the footprint of proposed changes is not a large percentage of the land base. For example, even the more conservative approach we recommend here would add regulations to only around 2% of the forested land base. Moreover, the materials provided by the department in Attachment 3 make clear that our neighboring states already provided as much or more protection for fish-bearing streams.

One important consideration, however, is that some individual private non-industrial landowners may, because of the specific configuration of their ownership, face a very significant change to their management choices. Such cases deserve serious attention to ensure equity and prevent undue burdens. We recommend that the Board request that the Governor's office take the initiative to develop mechanisms that could address this equity issue. We do not, however, believe that resolving that question should delay rulemaking.

Thank you for the opportunity to testify.

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