



Association of Northwest Steelheaders

6641 SE Lake Rd. • Milwaukie OR 97222

503-653-4176 • 503-653-8769 (fax)

office@anws.org • www.nwsteelheaders.org • Established 1960

Bob Rees
Executive Director

July 23rd, 2015

Oregon Department of Forestry
Salem Headquarters
2600 State Street
Salem, Oregon 97310

Re: Cold Water Standard

Dear Chair Imeson and Members of the Board:

The Steelheaders mission is “anglers dedicated to enhancing and protecting fisheries and their habitats for today and tomorrow.” With 1,600 members, largely in the Willamette Valley, this issue is very important to our members.

Many in our membership are retirees that now have time to fish and like most Oregon anglers, have the easiest access to rivers that don’t require boats to be successful. Right now, the bulk of our membership are home-bound, if not by ODF&W regulation, then by choice due to excessively warm water temperatures prohibiting fishing after 2:00 p.m. Many of our members are hanging it up for the season, during a time when they typically recreate the most as our rivers are filled with salmon and steelhead right now. This is the time to recreate but they’re watching fishing shows instead of making memories.

This decision will likely define the success of wild salmon on most private forest lands. As we are now witnessing, temperatures are playing the leading role in mortalities in our freshwater ecosystems right now. With an 80% likelihood of a continued El Nino weather pattern at least through the spring of 2016, the problem isn’t going to get any better and if you factor in climate change patterns, it’s likely to get much worse.

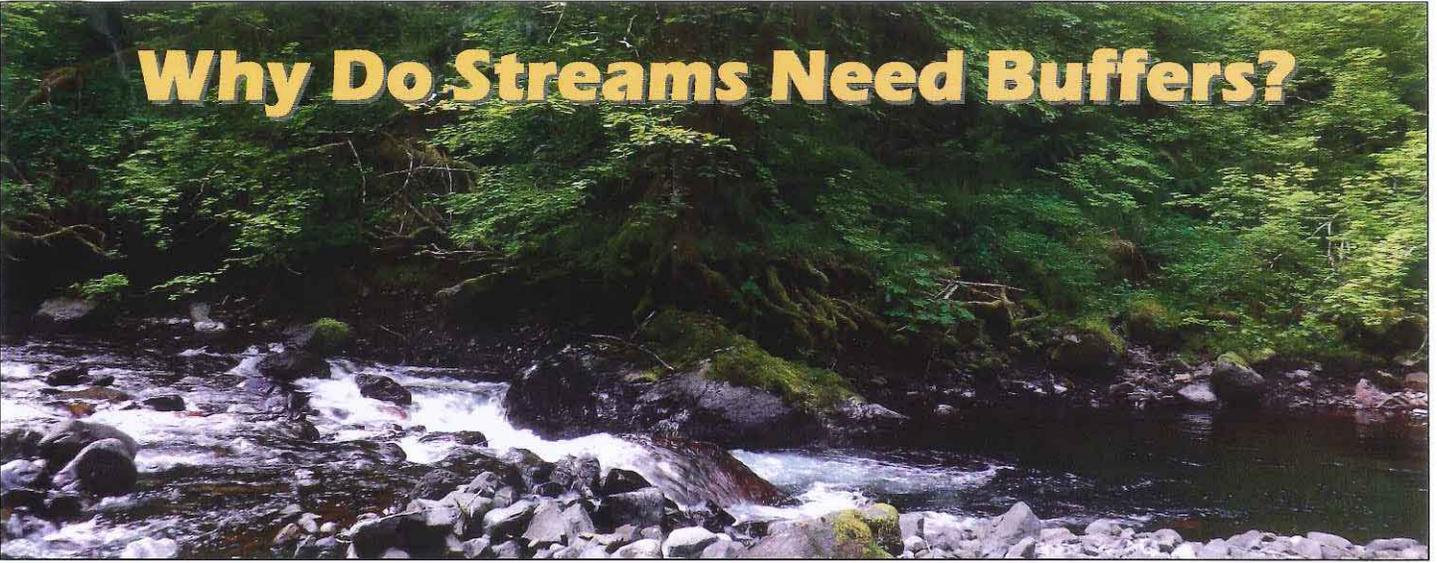
Fisheries experts are predicting a sudden downturn in ocean productivity, ending a period of extremely high productivity. Freshwater habitat becomes even more critical to population persistence when ocean productivity is poor. On one hand, this makes your decision a difficult one based on recent returns but we urge you to look into the future, when wild salmon will once again return at alarmingly low rates. For this reason, we urge the Board to adopt a *minimum* of a 100-foot no touch buffer and a variable retention target consistent with package 1. We need to ensure today’s decisions have tomorrow’s crisis in mind and follow the best available science for the survival of wild salmon.

Sincerely,

Bob Rees
Executive Director

*Anglers dedicated to enhancing and protecting fisheries and their habitats for today and the future.
The Association of Northwest Steelheaders is a 501(C)3 corporation: 91-1031100*

Why Do Streams Need Buffers?



Healthy riparian zones work to maintain stream health in many ways. Protecting riparian areas from headwaters to the mouth of rivers is needed to ensure healthy conditions for fish in tributaries with spawning and rearing habitat, as well as main stem rivers, which often are used only as migratory pathways. Trees and understory vegetation intercept solar radiation and provide shade to keep temperatures in a comfortable range for fish. Trees also stabilize banks, preventing erosion during floods, and provide wildlife habitat.

Inadequate buffers don't work. Narrow stream buffers offer too little shade to prevent stream warming, lack complexity, and are subject to blowdown, leaving no buffer whatsoever. Clearcut areas can't absorb precipitation, producing sediment-laden runoff that buffers can prevent from entering streams.

Protecting seasonal and intermittent headwater streams is important. Oregon's Forest Practices Act rule currently provides no protection for streams in the upper reaches of watersheds, reducing storage of cold groundwater for gradual release to maintain healthy stream temperatures for fish downstream.

Buffers reduce flood impacts. Forested stream buffers absorb storm water and help reduce the risk of downstream flooding.

Slides cost money. Devastating debris avalanches often begin in the steep, unprotected upper reaches of basins, accelerating as they move downstream. Roads and bridges are expensive to rebuild.

Adequate buffers maintain stream health. They control sediment, providing clean spawning gravel and are a source of organic matter and large woody debris.

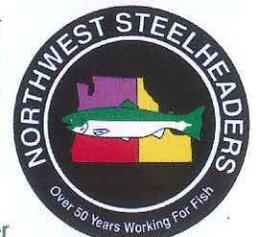


This photo of a fish-bearing stream on private land illustrates a blowdown of a narrow buffer. This site will continue to contribute silt to the river, resulting in compacted gravel that doesn't allow fish to spawn.

Narrow buffers do not create effective riparian zones. Small intermittently flowing and seasonal streams in the upper reaches of watersheds have a huge impact on stream health. The choice is clear: wider buffers are necessary if Oregon is to have healthy runs of salmon and steelhead.

Association of Northwest Steelheaders

executivedirector@anws.org • 503-653-4176 or 503-812-9036 • www.nwsteelheader
Board of Forestry July 23, 2015 Meeting Minutes Attachment 32





Temperature Issues

Lack of adequate riparian buffers on intermittent or non-fish-bearing streams in the upper reaches of basins leads to temperatures that exceed the DEQ core cold water habitat standard of 61 F for fish-bearing streams. High temperatures result in:

Lack of dissolved oxygen: Adult and juvenile fish need oxygen to survive. Incubating eggs will suffocate when the dissolved oxygen available is low.

Fish unable to move upstream: When DEQ standards are violated, fish are reluctant to move upstream from estuaries, which sometimes offer slightly cooler water. The delay makes spawning less successful.

Disease: Warm water makes fish prone to disease. This affects spawning success and can cause fish to die.

Most North Coast rivers have temperature issues. Most are in violation of DEQ standards during summer months. Climate change and the harvest of trees planted following the four Tillamook Burn cycles combine to increase stream temperatures. Even premier steelhead streams like the Salmonberry have exceeded DEQ standards for more than 70 days each summer, with temperatures as high as 76 F.



An example of an inadequate buffer on private forestland. This small buffer cannot begin to compensate for the clearcut areas.

If we expect to have healthy runs of salmon, steelhead, and trout, we must provide adequate riparian buffers.

Association of Northwest Steelheaders

executivedirector@anws.org • 503-653-4176 or 503-812-9036 • www.nwsteelheaders.org
Board of Forestry July 23, 2015 Meeting Minutes Attachment 32

