

## SELL Tara L \* ODF

---

**From:** SELL Tara L \* ODF  
**Sent:** Thursday, July 16, 2015 7:58 AM  
**To:** Cindy Deacon Williams ; Gary Springer; Mike Rose ; Nils D. Christoffersen; Sybil Ackerman-Munson; Tom A. Insko (tinsko@eou.edu); Tom Imeson (tom.imeson@nwnatural.com)  
**Cc:** DECKER Doug S \* ODF; HIRSCH Nancy \* ODF; DAUGHERTY Peter \* ODF; ANDERSEN Tony \* ODF; SELL Tara L \* ODF; HENNEMANN Nick \* ODF  
**Subject:** BOF: Letter from Committee for Family Forestlands FW: Letter to the Board  
**Attachments:** CFF Rip ltr SAL RB SW.docx  
**Importance:** High

Dear Board Members,

Forwarding a letter from the Committee for Family Forestlands related to riparian buffers.

Best regards,

*Tara*

---

**From:** DOMINIQUE Susan \* ODF  
**Sent:** Wednesday, July 15, 2015 3:36 PM  
**To:** SELL Tara L \* ODF <Tara.L.Sell@oregon.gov>  
**Cc:** TUCKER Lena L \* ODF <Lena.L.TUCKER@oregon.gov>; DAUGHERTY Peter \* ODF <Peter.DAUGHERTY@oregon.gov>  
**Subject:** Letter to the Board  
**Importance:** High

Hi, Tara,

Attached is a letter from the Committee for Family Forestlands to the State Forester, Board of Forestry Chair and members. Please distribute accordingly. This needs to be in their hands as soon as possible for the next BOF meeting.

Susan Dominique  
Private Forests  
[Susan.dominique@oregon.gov](mailto:Susan.dominique@oregon.gov)  
503-945-7502

# Committee for Family Forestlands

2600 State Street

Salem, OR 97310

503-945-7472

Fax 503-945-7490



To: Chair Imeson, Board members and State Forester Decker

From: Committee for Family Forestlands

Date: July 15, 2015

Re: Riparian Rules

As you are aware, the Committee for Family Forestlands has been very involved in learning about the impacts forest practices have on streams and the riparian rule-making process. Members of the Committee have attended both Board of Forestry and Environmental Quality Commission meetings, including the Board workshop and the Symposium on Paired Watershed studies, and have conducted outreach to many family forestland owners. We provided comments to the Board in May about the riparian rule-making discussion. We now provide additional comments we hope will be valuable from the perspective of the 67,000 family forestland owners in Oregon.

With our current Forest Practices Act, we no longer have acute impacts on water or fish, and forestlands provide the best fish habitat in the state. Small landowners are concerned that the call for increased regulation continues to focus on forests when there are arguably greater benefits to be gained by changing practices on lower stream reaches located in non-forestry uses.

Family forestland owners have many questions about the relationship between the stream temperature and modeling studies and actual harmful effects on fish. Moreover, the RipStream Study did not recognize the voluntary contributions to shade made by many landowners who leave as a matter of course more, wider and/or denser buffers than the FPA currently requires. Most of these landowners have a strong desire to leave their property in a better condition than it was when they took control and are committed to "doing the right thing" to protect the environment. We provided good evidence of this in our testimony in May where we shared the investment private landowners have made to stream restoration projects. At the same time, other studies of current FPA practices on actual fish show fish doing well.

As the economic data staff has given you shows, increasing buffer requirements will have a disproportionate effect on smaller, private landowners. The estimated costs over the decades are potentially huge: For example, ODF estimates that increasing buffer width to 90 feet on SSBT streams only in Western Oregon would cost private landowners \$120 million over time. Because 90% of family landowners have 100 acres or less, wider,

more restrictive, 2-sided buffers on small properties could make good management more difficult and expensive as well as reduce the economic value of both property and trees. A major concern in Oregon is keeping small forestlands in forests. One way to do this is to make the growing and harvesting of trees more economically attractive, not less.

In addition, both the harm from harvesting in accordance with FPA rules and the benefit of avoiding the slight rise in stream temperatures seen in RipStream are small. From the family forestland owners' point of view, the costs of increased leave trees and land taken out of financial use are greater than the possible small benefit to actual fish.

We recognize that the Board must act. We favor voluntary guidelines for increased buffers, with follow up studies to evaluate the effects actual practices have on fish. If the Board chooses to implement mandatory regulations, we believe they should be limited to SSBT reaches in the Coast Range, because of both the small effects on fish this change might have over our current FPA and a lack of study in areas outside the Coast Range.

Most small landowners take a long-term view of their forest management. If new rules are more complicated, more difficult to implement or feel more burdensome, we find this discourages long-term management and holding land in forest use.

Sincerely,



Susan Watkins, Interim Chair  
Committee for Family Forestlands

cc: Tom Imeson, Chair Oregon Board of Forestry  
Oregon Board of Forestry Members  
Doug Decker, State Forester,  
Peter Daugherty, Private Forests Division Chief

*\* The Committee for Family Forestlands is a standing committee established by the Board of Forestry to assist the State Forester and the Board of Forestry on issues relevant to some 70,000 family forestland owners in the state. Our committee is made up of family forestland owners from different regions of the state, environmental organization and forest industry representatives, a citizen-at-large and ex-officio members representing the Oregon State Forester, Oregon State University College of Forestry, Oregon Forest Resources Institute, the United States Forest Service, small forestland owner groups, and forestry interest/consulting groups.*