

Candace Bonner

RE: Public Comment, November 5, 2015 Board of Forestry Meeting.

Agenda Item: Riparian Rules Prescriptions Package

July 23, 2015

State Forester Decker, Chairman Imeson, and Members of the Board of Forestry:

Thank you to the riparian rules subcommittee for including many of things I and others requested in packages 1 and 2.

A few comments, based on my opinions developed from observations of the harvests on timberlands surrounding my own property:

Package 1:

If you allow variation in buffer width for operational flexibility, please define operational flexibility specifically so that it is limited to considerations of terrain and slope, etc, and cannot be applied simply to cut more desirable trees.

In your active management option B in package 1, I thank you for including a clause stating that active management must increase average DBH, and leave some of the largest trees. Please do use more specific language, such as in the California rule, which leaves the 13 biggest trees per acre, and also specifies leaving 70-80% minimum canopy. This is the best way to insure active management puts us closer rather than farther from achieving the Desired Future Condition. I continue to believe that a simple, no-cut buffer is easier to implement and monitor, and most likely to meet temperature and habitat goals and DFC.

In option B, hardwoods count equally in basal area. This usually results in more of the large conifers being taken. This can be problematic in terms of achieving the Desired Future Condition in many areas.

The large wood placement incentive can also be problematic if the goal is to create the healthiest RMA. Ideally a healthy RMA will naturally provide LWD over time. Conceivably cutting more trees in the RMA would result in the valuable larger trees being harvested and smaller trees placed in the stream, again taking us farther from the Desired Future Condition which naturally provides LWD.

Thank you for including exemptions for small property owners in both packages, essential for equity.

Currently and historically large fish streams have been better protected than small and medium streams. I urge you to bring large SSBT stream protection up to equivalency with small and medium SSBT streams when the new riparian rules are implemented. I have a personal interest in this. The City of Portland has invested much money in restoring Gordon Creek, the large F stream which crosses my property. Harvest boundary markers are now in place upstream of me. Given the amount of money invested in keeping this stream healthy, it makes sense that we fully protect this stream, as well as our other large SSBT streams.

Alternate practices:

It also makes sense to include the empirically derived, but as yet untested, RFPC alternatives for north side and one side harvests, and apply them only in a controlled and monitored fashion to test their efficacy in meeting the PCW standard, before any wider application.

Package 2:

Package 2 is well thought out, but much less likely to help us preserve our salmon and our riparian habitat as climate change progresses. Both Richard Whitman's data and the data cited in the recent BLM EIS, some of which I included in my prior commentary to you, make it clear that our waters will warm regardless of whether we harvest or not. The warmer the baseline, the smaller the temperature increase with harvest needed to push temperatures into the danger zone for salmon. Package 2 does not adequately protect cold water.

Of the two packages, I urge you to choose Package 1, as it comes much closer to protecting our streams from warming due to timber harvest. I urge you not to include multiple choices for landowners from both packages, if some of those choices offer less protection for our streams.

Respectfully submitted,

Candace Bonner

Member(Public) Northwest Regional Forest Practices Committee