

Committee for Family Forestlands

2600 State Street

Salem, OR 97310

503-945-7472

Fax 503-945-7490



April 25, 2012

John Blackwell, Chair
Oregon Board of Forestry
2600 State Street
Salem, OR 97310

RE: Protection Standards on small and medium fish bearing streams

Dear Chair Blackwell and Board Members:

Over the last several years the Committee for Family Forestlands* has closely followed discussions concerning water quality and forests including the recent Ripstream and paired watershed studies. We understand that concern over stream temperature increases following operations that meet minimum FPA standards may lead the Board to consider revising riparian management rules. We write to ask the Board to keep in mind that rules should balance both localized effects and practices that impact the larger landscape over time and that rule-making actions may impact small forest ownerships differently from larger industrial blocks.

The CFF is supportive of the state's overall efforts to improve the health of riparian areas and to maintain high quality water. As evidenced by the specific attention given to stream and riparian conditions on small forest ownerships during the fall 2011 Board tour of family forestlands, we understand the impacts, including positive impacts, that management activities can have on stream conditions. The CFF has been keenly interested in understanding the impact current and potential future policy may have on family forestlands and their owners, who by their very ownership positively impact water quality in the landscape where Oregonians live, work and play.

The intent of this letter is to note several principles we consider important for any policy related to riparian management and recommended forestry practices related to water quality.

- 1) The current working agreement between the Board of Forestry and the Environmental Quality Commission regarding policy making and implementation should be maintained.
- 2) Keeping forestland in forests across Oregon's landscape should be a primary policy goal as forestlands have the highest quality water over the landscape.
- 3) Family forestland owners are particularly sensitive to changes in riparian standards and management prescriptions with set asides of special management zones, because such zones often impact a larger proportion of a typical family forest ownership than of larger ownership blocks.
- 4) Family forestlands are embedded in and "connected" to the larger landscape, interdependent on the upstream and downstream effects. Commitments to landscape

level benefits need to be balanced with particular impacts related to actions on specific blocks of land.

- 5) Family forestland owners understand that forests are dynamic ecosystems. Change does occur with and without management action. We have concern that recent studies showing small changes in stream temperature on private lands treated to minimum forest practices standards may not reflect the dynamic nature of forests.
- 6) Family forestland owners have many different ownership goals and reflect a wide variety of values. Surveys confirm that family forestland owners treasure the lands, ecosystem values and their relationship to the land over time.
- 7) Family forestland owners are prepared to "do what's right" as long as the standard is based on the best science. For example, some paired watershed studies show small temporary temperature increases in short stream segments, which may have no effect (and even positive effects) on fish in the stream. The CFF suggests that any Board decision should carefully consider all available research including but not limited to the Ripstream stream study as well as all information coming from the three paired watershed studies currently underway in Oregon. It is important to look beyond the temperature metric and evaluate the impact riparian management activities have on fish directly if fish recovery is the goal.
- 8) Family forestland owners are concerned about the additional costs of implementing new standards. Many family forestland owners treat riparian areas as "no touch" zones because the rules are too complex for easy application. This may not be in the best interests of the forest, the streams, landowners, or the public. Standards should balance marginal benefits with the costs of a change in the standard, including the costs to small landowners of securing the expertise required to help manage to the new standard

These several issues continue to be of concern to the CFF. As the Department and Board of Forestry address issues raised by Ripstream in the months ahead, we will be attentive and we will weigh in on specific principles, proposals, and policy alternatives as they emerge.

Please do not hesitate to involve the CFF in future discussions regarding forests and water quality generally, the role family forests play in maintaining Oregon's forest landscape, or policy issues specifically related to the Ripstream and paired watershed studies.

Sincerely,

Committee for Family Forestlands



Craig Shinn, Chair



Susan Watkins, Vice Chair

cc: Oregon Board of Forestry Members
Doug Decker, State Forester

* The CFF is a standing committee commissioned by the Oregon legislature to advise the State Forester and the Oregon 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 areas of the state, environmental organization and forest industry representatives, a citizen-at-large and ex-officio members representing the Oregon Department of Forestry (ODF), Extension Service, Oregon Forest Resources Institute and logging or forestry consulting interests.