



**BEFORE THE OREGON BOARD OF FORESTRY**

June 7, 2017

Public Comment on Agenda Item 5

ODF/OWEB Report on Voluntary Restoration Efforts by Forest Landowners

*Mary Scurlock, Coordinator, Oregon Stream Protection Coalition (OSPC)*

[Mary.scurlock@comcast.net](mailto:Mary.scurlock@comcast.net)

We appreciate the collaborative effort that went into producing March 2017 report entitled “Voluntary Efforts by Forest Landowners to Restore Salmon Habitat and Watersheds in the Oregon Coast Range.” We strongly support full recognition of land managers who voluntarily go above and beyond minimum regulatory requirements to improve aquatic habitats for their intrinsic value at their own expense. These efforts should continue to be encouraged.

However, OSPC is concerned about the extent to which the report implies that completion of projects is known to have benefited coho salmon in one way or another without reference to either implementation or effectiveness monitoring studies, or to whether the actions taken actually address recovery priorities under the federal ESA recovery plan. We note that, in general, NOAA Fisheries has cautioned that we will need to evaluate returns affected by the poor marine conditions of the last several years to understand the sufficiency of freshwater habitat<sup>i</sup>. The 2016 Status review specifically notes that:

“New information available since the last status review indicates that a number of restoration and protection actions have been implemented in freshwater and estuary habitat throughout the range of OC coho salmon. However, at this time we do not have information that would reveal improvements in habitat quality, quantity, and function. Future status assessments would benefit from a systematic review and analysis of the amount of habitat addressed against those high priority strata identified in the NMFS 2015 Proposed Recovery Plan. We remain concerned about degraded habitat conditions throughout the range of the OC coho salmon ESU, particularly with regard to land use and development activities that affect the quality and accessibility of habitats and habitat-forming processes such as riparian condition and floodplain function as well as water quality. **Overall, we conclude that the risk to the species’ persistence because of habitat destruction or modification has not changed since the last status review.**”<sup>ii</sup>

Effectiveness Monitoring is Needed. The report itself acknowledges that effectiveness monitoring still is needed. Many of the projects acknowledged in the report were likely carefully designed for benefits to aquatic habitat, including the primary limiting factor for

coho recovery of habitat complexity. But this report does not itself evaluate the effectiveness of specific projects or the overall cumulative effectiveness of projects relative to any particular criteria or metrics (e.g. increased numbers of pools, channel-to-floodplain connectivity, off-channel habitat, stream temperature/water quality concerns, location of projects in priority reaches or which address priority recovery actions). In our view, the most important investment that the Department of Forestry's monitoring unit can make related to voluntary efforts goes beyond merely counting the number and cost of projects to robust effectiveness monitoring -- something that this report only aspires to do under next steps, resources permitting.

Until such monitoring is done, it is premature to make statements about the benefit of restoration projects – voluntary or otherwise – for coho.

We further encourage the Board's attention to the participation of small forest landowners whose management objectives and need for incentives differ from those of industrial owners.

Expectations for the ecological benefits of voluntary restoration efforts should be realistic and based on metrics that relate to recovery outcomes. This effort to catalogue the last 20 years of voluntary restoration is an important piece of information because it will help set realistic expectations for voluntary efforts. The federal coho recovery plan recognizes the potentially positive role of these efforts.<sup>iii</sup> But unless and until such voluntary efforts are demonstrated to be effective and obviate the need for regulatory change, the need for stronger land use controls will remain.

Also needed is a further clarity about the metrics that will be used to demonstrate attainment of desired habitat recovery outcomes through any mechanisms, including those identified in the federal recovery plan. For timberlands, these metrics should relate to increased shade through increased retention of riparian trees, increased sustainable natural recruitment of large wood, and other factors related to habitat complexity and road system impact reductions.<sup>iv</sup>

---

<sup>i</sup> See e.g. NOAA-NMFS, 2016, 2016 5-Year Review at 12: "it is only when marine survival is low that it becomes apparent whether habitat quality and quantity are sufficient to support self-sustaining populations. With marine survival rates expected to decrease for OC coho salmon entering the ocean in 2014 (Peterson et al. 2014a and b), 2015, and 2016, it may be advisable to wait to observe how populations fare during this potential downturn before deciding to change their status (NWFSC 2015)."

[http://www.westcoast.fisheries.noaa.gov/publications/status\\_reviews/salmon\\_steelhead/2016/2016\\_oc-coho.pdf](http://www.westcoast.fisheries.noaa.gov/publications/status_reviews/salmon_steelhead/2016/2016_oc-coho.pdf)

<sup>ii</sup> Id. at pp. 19-20, emphasis added.

<sup>iii</sup> [http://www.westcoast.fisheries.noaa.gov/publications/recovery\\_planning/salmon\\_steelhead/domains/oregon\\_coast/oc\\_coho\\_plan\\_exec\\_summary\\_12\\_16.pdf](http://www.westcoast.fisheries.noaa.gov/publications/recovery_planning/salmon_steelhead/domains/oregon_coast/oc_coho_plan_exec_summary_12_16.pdf)

<sup>iv</sup> [http://www.westcoast.fisheries.noaa.gov/publications/recovery\\_planning/salmon\\_steelhead/domains/oregon\\_coast/final\\_north\\_coast\\_stratum.pdf](http://www.westcoast.fisheries.noaa.gov/publications/recovery_planning/salmon_steelhead/domains/oregon_coast/final_north_coast_stratum.pdf).