



Oregon  
Stream  
Protection  
Coalition

**BEFORE THE HOUSE COMMITTEE ON ENERGY AND ENVIRONMENT**  
Statement from the Oregon Stream Protection Coalition  
related to testimony provided on HB 2656  
21 March 2019

- Association of Northwest Steelheaders
- Audubon Society of Portland
- Audubon Society of Salem
- Cascadia Wildlands
- Center for Biological Diversity
- Coast Range Association
- Defenders of Wildlife
- Greater Hells Canyon Council
- Institute for Fisheries Resources
- KS Wild
- McKenzie Flyfishers
- Native Fish Society
- Northwest Environmental Advocates
- Northwest Guides and Anglers
- Northwest Sportfishing Industry Association
- Oregon Wild
- Pacific Coast Federation of Fishermen's Associations
- Pacific Rivers
- Rogue Riverkeeper
- Sierra Club
- The Conservation Angler
- Trout Unlimited
- Umpqua Watersheds
- Washington Forest Law Center
- WaterWatch of Oregon
- The Wetlands Conservancy
- Wild Earth Guardians
- Wild Salmon

My name is Mary Scurlock, Coordinator of the Oregon Stream Protection Coalition, an ad hoc statewide partnership of conservation and fishing industry organizations focused on ensuring that nonfederal forest practices regulations are adequate to achieve water quality standards and aquatic species conservation goals. We strongly agree with the legislative sponsors of HB 2656 that the current regulatory regime does not adequately protect water resources on nonfederal forestlands.

The purpose of this statement is to encourage members of the Committee to “look under the hood” of testimony already provided by other witnesses so that you can better understand why the majority of Oregon’s conservation community is convinced that the status quo is not adequate for protection of Oregon’s working forest waters.

**1. Testimony from State Forester Daugherty on forestland water quality is misleading in that it lacks focus on private lands.** You were told that “forestlands” have the highest water quality in the state, and that is true – but only because that general assessment includes the large acreage of federal forestland managed under much more stringent restrictions on logging that those applicable to state or private lands. Furthermore, Oregon Department of Forestry relies on an “index” that does not reflect how DEQ – the lead enforcer of water quality standards under the Clean Water Act -- would respond if you asked it directly how we are doing at meeting water quality goals on state and private forestlands.

The fact is that many streams and other water bodies on state and private land are not meeting water quality standards and lack stream habitat characteristics necessary for the conservation and recovery of native fish and other aquatic species. For example, EPA analysis of temperature- and sediment- impaired waters in the Siskiyou Region of SW Oregon shows *80% of impaired stream miles are on private forestlands*. (EPA, 2018). [http://oregon-stream-protection-coalition.com/wp-content/uploads/2018/03/Memo\\_Eastern\\_Cascades\\_Rogue\\_Siskiyou\\_Blue\\_Mountain\\_Listings\\_3\\_0\\_6\\_2018.pdf](http://oregon-stream-protection-coalition.com/wp-content/uploads/2018/03/Memo_Eastern_Cascades_Rogue_Siskiyou_Blue_Mountain_Listings_3_0_6_2018.pdf)

But don’t take it from me: I urge you to ask DEQ and EPA to provide you with breakouts of the miles of “water quality impaired” streams for key water quality parameters on private forestlands statewide. You will see that while many of these lands are doing better than agricultural and urban/suburban lands, they are not meeting the state’s goals for water quality by a long shot.

**2. Testimony from Weyerhaeuser Company misleadingly implies existing research conclusively proves current stream protections are adequate to protect against water and habitat degradation from industrial logging statewide.** We agree that current practices are better than historical ones, but we cannot agree that they are adequate nor that “the science” is dispositive of the issue.

Testimony from Maryanne Reiter of Weyerhaeuser Company urged you to find that the available science conclusively demonstrates contemporary forest practices protect water quality, citing three papers analyzing data from the Watershed Research Cooperative’s “paired watershed” projects. (Hatten, 2017; Bywater-Reyes et. al. 2017, and Arismendi 2017). Ms. Reiter emphasized findings that did not detect a difference in sediment before and after harvest, including some related to roads and findings of high variability in background levels of sediment.

*What you were not told is that the paired watershed studies cited are simply not capable of addressing the real problems with contemporary forest practices because of the limitations of the studies' design. The effect of long-term significant sediment increases and large wood depletion cannot be detected within the short timeframe of the cited studies. Moreover, the high site-to-site variability in sediment production Ms. Reiter bids you focus on does not mean that management-related sediment increases don't occur: it just means that the small sample sizes of these studies rendered them powerless to pick up the signal.*

From a memo prepared last year for my Coalition and the Board of Forestry:

These experimental watershed studies are principally useful to detect whether very short term, low-level impacts are occurring that are below the resolution of large-sample synoptic studies to detect. The results indicate that within the initial 1-2 years post logging, these sites saw few logging-attributable effects that were below detection thresholds in the data commonly used to inform synoptic studies.

*The results of paired watershed studies do not substantiate that current forest practices in general do not produce adverse impacts to streams.* In this regard, the results of these very short term, tiny-sample watershed studies are relatively trivial compared to the results of synoptic studies account for longer-term process-response cycles and stochastic triggering events such as drought, windthrow (blowdown) and long duration or high- intensity precipitation events. These are well recognized in past research as the events that trigger large-magnitude and highly persistent responses in streams; they will eventually affect most or all logged watersheds, but are highly unlikely to occur within the 1-2 year time frame and within the very small number of sites measured in these paired watershed studies

I refer you to the full text of a memo on the limits of the paired watershed research available here: <http://oregon-stream-protection-coalition.com/wp-content/uploads/2018/06/Review-of-Three-Recent-Oregon-Paired-WatershedPublications.pdf>

Thank you for your attention to these important public natural resource issues.

Sincerely,



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