



BEFORE THE OREGON BOARD OF FORESTRY

Statement of Mary Scurlock, Oregon Stream Protection Coalition
Agenda Item 3: Siskiyou Streamside Protections Review
8 January 2019

Timely Degradation Finding Regarding Stream Temperature as Priority. Our priority is for this Board to reach a final decision about the sufficiency of the current water protection rules with respect to stream temperature in the Siskiyou based on all available relevant information, including the expanded literature review. It would be ideal to decide the sufficiency of the rules to meet “desired future condition” at the same time, but not if alignment requires delay of a decision on stream temperature. We urge the Board to establish July 2020 as a firm date to decide whether resource degradation is occurring in the Siskiyou under current rules.

Climate Change Should Be Considered Without Delaying A Degradation Decision. We believe that available information on climate change is important contextual information that should be incorporated into the Siskiyou analysis, but that a 9 to 12 month project is not required to provide this information to the Board. We hope that you can find a way to scale back Option 1 to focus on the three identified information sources (the NorWest model, Spies et. al. 2018 and the Southwest Oregon Adaptation Partnership) in a way that fits within a hard July 2020 decision point. Your direction can clarify that consideration of this information in no way shifts the focus of your decision away from the discrete impacts of current forest practices on stream temperature.

Climate Change Option 2 creates a false tradeoff by for the Board. Option 2 outlines a policy analysis and development project that ODF (and other state agencies) may well find both necessary and valuable, but it does not belong in this Siskiyou Stream Rules review. We do not think that pursuing this or a similar policy development option should have any direct bearing on the conduct of the Siskiyou rules analysis, nor should it burden the Department’s limited effectiveness monitoring budget.

Project Charter (Attachment 2): This is a useful format to convey project scope. We have a few concerns:

- We suggest attaching a timeline, including past milestones.
- The outcome of the ODF-DEQ collaboration is described as a “process for aligning agencies’ sufficiency reviews.” Does this mean the result is simply a process for future alignment, or can we expect to accomplish actual alignment within the context of the Siskiyou rule review? When will the parties get beyond the current stage of “clarifying” their respective legal and policy authorities and mandates and finalizing statements of intent?
- We suggest that the description of monitoring options in the charter be amended to clarify how final decisions about how and whether to proceed will be made;
- The landowner-controlled regional committees are listed as “interested parties” that will be represented on the Siskiyou Advisory Committee but these committees do not actually represent a separate stakeholder group from forest landowners, who are already recognized. We suggest that it may be more appropriate to include county governments, local watershed councils or water providers as interested parties.

Committee Objectives (Attachment 3). We appreciate that the purposes of the committee have been clarified and that the Department recognizes the importance of prioritizing inclusion of Siskiyou region members and the use of in-region locations as budgets allow.