

April 9, 2014

Oregon Board of Forestry
Salem, OR

Dear Member of BOF:

The Shibley family has been living here on over 400 acres of farm and forestland since 1864. I am a fourth generation steward of the resources --for my family and for Oregon. We grow and sell food and fiber. Natural growth, managed, becomes products that provide income. We also willingly provide for the public many large but hard to quantify benefits to water, fish and wildlife.

As we sit around a family council table deciding how to manage land and dollars we usually look for the most bang for the buck. As you manage household or business assets you probably think the same way. As you sit at the Board table together I imagine some sort of benefit to cost ratio enters the discussion. I hope it does anyway, as you consider water protection rules, even though the benefit is to the public and the cost is to us forest families.

If you must change the way we treat riparian management areas in order to assure a very small lowering of water temperature, please keep these points in mind:

1. There needs to be a reasonable proportionality between benefit to the public interests and cost to the private interests, especially when the law of diminishing returns shows its ugly head and a lot more trees are said to be needed for a little bit of cooling.

2. The current FPA rules are intended to encourage management, not just no-touch in RMAs. This improves the prospects for quality of stream-side and in-stream habitat (larger trees sooner via thinning) and also quantity of income to offset management expenses.

3. If there is solid scientific evidence for the fish needing a certain temperature and for more forest buffering being the best way to get it, then you must be able to convince people like me that the benefit outweighs the cost. This may mean negotiating in advance a threshold of a certain level of cost above which individual landowner compensation becomes obligatory.

Regarding my point 2, it is a fact that a 50 ft. buffer we planted on a small fish stream across a pasture now needs pre-commercial thinning (X\$ input for 0\$ out). We not only fenced it but also added large wood to enhance fish habitat. Our planned commercial harvest is still about 15 years away. Shade is certainly just a small part of what this stream provides under your rules and our actions. If it had been already forested and there had been no-touch buffer rules it would still be a blackberry thicket. The temperature would be not much different and the fish would argue that they, in their long-term view of nature, are better off with our neighborly and hospitable efforts.

I urge you to remember those fish and us land stewards when you are knee deep in science data and models alongside EPA and DEQ temperature standards. Imagine coming to our table and our creek to get a real-world perspective.

Gilbert Shibley