

To: Oregon's Environmental Quality Commission (EQC), March 20, 2014

From: Scott Hanson (President-Elect Oregon Small Woodlands Association)

General Background

- I have owned a 92 acre woodland property in Marion County since 1994. This property has 1500 lineal feet on a small fish bearing stream and 2100 feet on a medium fish bearing stream.
- The impact of current Oregon riparian stream rules on my land includes: a 20 foot "no touch" buffer of 1.5 acres (2 %) which is within a riparian management area of 4.8 acres (5 %). I support the protection of public values in Oregon's Forest Practice Act (FPA), because they are based on science with consideration of minimal impact to landowners.

Specific Issue of Oregon's Cold Water Standard

- The Oregon Board of Forestry is currently in a rule making procedure to evaluate whether riparian stream rules for small and medium fish bearing streams under Oregon's FPA meets Oregon's Cold Water Standard set by Oregon's EQC.
- Rule making was triggered by a scientific study called RipStream which found harvests on private coastal land test sites increased small and medium stream temperature forty percent of the time by .7 degree Celsius. The EQC's Cold Water Criteria requires that human activity can increase water temperature by no more than .3 degree Celsius.
- OSWA does not dispute RipStream Study findings, but we do think EQC needs to take a hard look at the current Cold Water Criteria (CWC) developed over a decade ago.
- New science supports no harm to fish from minor and temporary temperature increases above .3 degree Celsius; providing temperature remains below the numeric criteria.
- Recent paired watershed studies show benefits to fish populations when minor increases in stream temperature occur in small and medium streams.
- I request the EQC take a serious look at new science about minor temperature increases in forest streams and that you change the current cold water criteria to better reflect current scientific knowledge. Please do not allow poor public policy to actually harm the beneficial uses of forest streams.
- Our thinking needs to evolve beyond reliance on a single measurement criteria, and focus on how temperature changes impact fish and other aquatic populations. Both short-term and long-term.