OREGON SOCIETY OF AMERICAN FORESTERS
4033 SW Canyon Road • Portland, OR 97221 • 503.224.8046

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Oregon Department of Forestry
2600 State Street
Salem, OR 97310

RE: Comments on Proposed Rules for SSTB Streams

In my role as Chair of the Policy and Legislation Committee of the Oregon Society of American Foresters (OSAF), I submit here some comments on the proposed rules for SSTB streams in western Oregon. Although OSAF does not have a formal position on the specific rulemaking that is underway, it has adopted a highly relevant position statement on “Managing Riparian Forests” (available at www.forestry.org/oregon/policy/position/). This position statement provides a strong foundation for the comments provided here.

For background about my organization and perspective, the OSAF has nearly 1,000 members and is the largest state affiliate of the national Society of American Foresters (SAF). The SAF supports and represents the forestry profession in advancing the science, education, technology, and practice of forestry. OSAF members work throughout the state in a variety of organizations, including local, state and federal agencies, higher education, as well as the private sector.

Many OSAF members are directly involved with planning and administering forest operations that must comply with Oregon’s Forest Practice Rules, and thus they are primary stakeholders in the current rulemaking process. However, I must emphasize that OSAF provides an independent, professional perspective rather than the views of our members’ employers, public or private.

At this late stage in the rulemaking process, it is likely that primary interest will be focused on fine-tuning the proposed rule changes. However, important facts about the science, policy and practices for forest stream protection in Oregon compel me to make the following broad observations about the proposed rules:

- The proposed rule changes continue to use tree basal area as the primary surrogate for shade-producing vegetation. Given that the main goal of the new rules is to maintain cool stream temperatures for aquatic habitat, there should be more explicit allowance and methods provided for shade-centric riparian management alternatives. Otherwise, the new rules will continue to reflect little substantive consideration of cost-effective policy, along with the potential unintended consequences of discouraging landowner cooperation and innovation to better meet the cool water objective.

- Like all forests, riparian areas are locally unique, dynamic and ever-changing. The proposed rules continue the trend toward highly precautionary and restrictive policies for riparian forests, i.e., active management is prohibited or discouraged by rule complexity. This policy approach has not consistently produced desirable environmental results and does not effectively address changing environmental conditions and influences.

- Active management can maintain or improve riparian forest benefits through carefully applied professional forestry, fisheries, and hydrology expertise and experience. There is growing need to encourage active management of many of Oregon’s riparian forests, with updated policies and direction to promote research, education and incentives that effectively support desirable resource conditions. Although the proposed rules for SSTB streams include a section (629-642-0700) intended to help restore or enhance riparian areas through alternate practices, the applicable situations and directives appear to do little to encourage active management. When combined with the much more extensive general prescriptions that further restrict management, there is added concern that adoption of the rules in their current form will simply set a precedent for further policies that discourage resource improvements through the active efforts of landowners and managers.

Thank you for your attention to this input. If you have any questions or if OSAF can provide any assistance regarding this important issue, please do not hesitate to contact us.

Sincerely yours,

Paul W. Adams, Ph.D.
Oregon SAF Policy and Legislation Committee Chair