



Native Fish Society
PO Box 568/103 S. Molalla Ave.
Molalla, OR 97038
503-829-6202
nativefishsociety@molalla.net

The Voice for Native Fish

Conserving biological diversity of native fish and protecting their habitats

Jan. 28, 2010

TO: Oregon Department of Forestry and Board of Forestry
Attn: Jeff Foreman
FR: Russell Bassett, River Steward Coordinator
RE: Proposed changes to the Northwest Forest Management Plan

Dear Oregon Department Forestry and Board of Forestry,

Thank you for this opportunity to provide written comments regarding proposed changes to the Northwest Forest Management Plan. We look forward to working with you to improve watershed health in state forest lands.

The Native Fish Society is very concerned with the proposed NW FMP rule-making and other proposed changes undertaken by the Oregon Board of Forestry. We are certain these changes will be a detriment to restoration of native fish species in state forests watersheds. We have that certainty due to the volumes of science that have documented the negative effects of timber production on salmonids. Specifically, we are very discouraged by the emphasis placed on increased clear-cutting that runs throughout the proposed changes.

Healthy forests are extremely important to Oregon's native fish. Our regional icons salmon, steelhead and trout need cold water with complex habitat to survive and thrive, and forests provide this in the form of stream shade and large woody debris, which serves to create and maintain habitat complexity, increases the retention of spawning gravel and nutrients, reduces the velocity of high flows, and creates refuge areas for juvenile and adult fish.

Salmonids die at water temperatures above the mid-to-upper 70s°F. The water quality effects of warmer water include increased incidence of disease, inability to spawn, reduced rates of growth and survival of eggs and juveniles, increased competition for limited habitat and food, reduced ability to compete with other species that are better adapted to higher temperatures and other adverse effects. According to DEQ, the principal cause of stream heating is the removal of trees and other shade-producing woody vegetation. Removing trees and other vegetation also causes stream bank erosion that results in wider river channels and increases sedimentation. Wider channels expose more of the river water to direct sunlight. In 1996, the Department of Environmental Quality (DEQ) listed 12 river segments in the Tillamook Bay Watershed as not meeting state standards for temperature.

Chris Knutson, Oregon Department of Fish and Wildlife North Coast district biologist, recently reported that "lack of habitat, excessive temperature, spawning ground gravel quality and redd stability" were the top three threats to the recovery of salmon and steelhead in the Nehalem River, and these proposed changes will only help to amplify these threats.

In addition, forests effectively remove carbon dioxide pollutions from the air. Forests are nature's most efficient way to store carbon, cleaning the air we breathe. Since logging releases significant amounts of stored carbon pollution, protecting our forests from excessive timber harvest is an important step in stopping climate change.

Also, we assert that the changes proposed are inconsistent with the Oregon Plan for Salmon and Watersheds. Public funds are being distributed through the Oregon Watershed Enhancement Board to repair fish habitat in Oregon streams, so it does not make sense to make public investments in stream protection by the State and let a State agency jeopardize that investment.

Furthermore, we contend that these changes move Oregon state forests away from a sustainable model of timber production to an unsustainable industrial model, and move the Tillamook and Clatsop State Forests off of their restorative trajectory. The proposed rule-making also undermines the search for balanced and sustainable forest management, are at odds with the federal government's work to remove species from the Endangered Species Act list, and are in violation of applicable law.

The following is quote is from a December 14, 2005 letter from the U.S. Environmental Protection Agency to ODFW:

"... there is a substantial body of science demonstrating that Oregon's existing forest practice rules and best management practices do not consistently meet water quality standards or fully provide riparian functions important to water quality, public water supplies and fish. Expert reviews and research have identified the need for increased protection of riparian management areas and landslide prone slopes in Oregon for both fish and non-fish streams to provide functions important for fish and water quality. ... additional revisions to the rules are needed to ensure water quality standards will be met and that beneficial uses such as salmonid spawning and rearing will be fully protected."

Also, Oregon forest practices, which were pioneering in regards to habitat protections in 1971, are now way behind what is needed, and these proposed changes to state forest land management are a huge step in the wrong direction. Oregon is in danger of losing millions in federal funding if it continues down this path. The following quote is from a letter to the Oregon Department of Environmental Quality and Oregon Department of Land Conservation and Development from the EPA and National Marine Fisheries Service in August 2009:

"Oregon's forestry program lacks adequate measures for protecting riparian areas of medium, small and non-fish bearing streams, high risk landslide areas, and for mitigating the impacts of legacy roads."

Finally, NFS asserts that more time is needed to study the effects of these changes on state forest ecosystems. The IMST agreed in January 2010 to take a look at this issue, and they need a minimum of a year's time to report their findings. For the BOF to push for these changes in June 2009 and then adopt them in April 2010 is unrealistic. More time is needed for proper scientific review.

The following are specific concerns the Native Fish Society has with the proposed NW FMP rule-making:

- Habitat Conservation Plans should not be removed from the language of the FMP. These are necessary plans for the protection and restoration of threatened native fish species and other species of concerns.
- NFS finds it disturbing that the language places economic values of state forests first, especially when the BOF's own mission statement places environmental values first: *"It is the Mission of the Oregon Board of Forestry to... lead Oregon in implementing policies and programs that promote environmentally, economically, and socially sustainable management of Oregon's 28 million acres of public and private forests."* While we realize that increasing timber harvest might create some short-term economic benefits to the timber industry and county governments, Oregon state forests belong to all Oregonians, not just the timber industry and county government. Furthermore, tourism and recreation are important aspects of the Oregon economy, and the proposed changes will hurt those industries, negating the economic outputs of increased clear-cutting. A recent study by ODFW and Travel Oregon showed that fishing, hunting, and wildlife viewing contributed more than \$130 million in travel-generated expenditures in Clatsop and Tillamook counties in 2008. In addition, the timber industry is more and more automated, while the tourism, recreation and service

industries are still primarily manual. Furthermore, it makes no sense at all to increase timber production when timber prices are at record lows. This sends the wrong economic message.

- The Endangered Species Act wording should not be removed. If it is removed, the added sentence should read “When necessary to provide short term habitat consideration for wildlife and fish species of concern, additional tools WILL be used, including Anchor Habitats and site protections.”
- The Native Fish Society rejects all the changes to percentages of clear-cutting that would be allowed with adoption of these changes. The percentages should remain as they are under the current plan, which designates 50% of the forest for complex stands. The proposed changes would allow that target to drop to 30% of the forest, a loss of an estimated 100,000 acres. This is completely unacceptable and endangers already imperiled native fish runs, as well as the humans that depend on them.
- There is already not near enough quality fish habitat in the Tillamook and Clatsop State Forests. For example, according to 2007’s Oregon Coast Coho Conservation Plan for the State of Oregon by ODFW, the Nehalem needs 393 acres of quality habitat and has only 82 acres, 21 percent of what is needed. This is under the current plan, without the proposed changes, which will reduce quality habitat even more.
- Salmon Anchor Habitats should be a permanent part of this plan. They should not be abandoned in favor of Aquatic Anchor Habitats that may be implemented as needed. Under the current strategy, 8 of the 17 Salmon Anchor Habitats are at moderate to high risk of impaired watershed function. Under the new strategy, 13 of the 17 Aquatic Anchor Watersheds would be at moderate to high risk due to increased cumulative percentage of clearcut harvest within those habitats, according to ODF biologist in the Species of Concern Analysis.
- The integrated management strategies may be “intended over time to result in habitat conditions on the landscape and in aquatic and riparian areas that will provide functional habitat conditions for native fish species,” however, that is the exact opposite of what will happen with these changes. The proposed strategy was found to have a “low probability to enhance watershed function” due to “an initial increase in high risk and individual watersheds attain very high levels of cumulative clear cut percentages,” in the Species of Concern Analysis, conducted by the agency’s own biologists.

In closing, the Native Fish Society believes the proposed rule-making for the Northwest Forest Management Plan are the wrong direction for Oregon and should be abandoned in total. The Native Fish Society realizes that timber production is important to the lives of Oregonians and we are not opposed to timber harvest. However, we are opposed to forest practices that jeopardize our regional icons salmon, steelhead and trout, which these changes do.

Also, we have been impressed with the professionalism and dedication of ODF staff, and are convinced they want to do the right thing, if only the BOF would let them.

We look forward to working with you to protect and enhance native fish species and the habitats that nourish them on behalf of all Oregonians.

Respectfully,



Russell Bassett
River Steward Coordinator