



American Fisheries Society

Oregon Chapter

*PO Box 722
Corvallis, OR 97339
www.orafs.org*

October 25, 2004

Ms. Leslie Batten
Oregon Society of American Foresters
888 SW Fifth Avenue, Suite 1460
Portland, Oregon 97204

Dear Ms. Batten,

The Oregon Chapter of the American Fisheries Society appreciates the opportunity to comment on "Rule Concept #8". Rule Concept #8 is one of the proposed changes to part of the state's Forest Practices Act (FPA) that the Oregon Department of Forestry (ODF) and the Board of Forestry are currently considering. In general, we support Rule Concept #8 because it increases protection of riparian habitat, which will benefit fish.

The existing rule has been inadequate, as documented in a 2002 study conducted by ODF and the Oregon Department of Environmental Quality, titled "A Statewide Evaluation of FPA Effectiveness in Protecting Water Quality". We concur with the findings in this document; specifically, that the existing riparian protection, as measured by per-acre basal area, for medium and small streams is inadequate and water quality is below accepted standards for such items as temperature and sediment retention (i.e., shading and large wood output). In general, large streams were found to have adequate protection.

We support Rule Concept #8 because it will provide significant improvements to riparian protection (i.e., greater per-acre basal area requirements) for medium and small streams. Native fish will benefit from cooler water resulting from increased shading and from stream complexity provided by large wood.

Although Rule Concept #8 is an improvement and we realize that riparian areas may be limited by other objectives, we believe even greater riparian protections should be implemented to benefit native fish. For example, fish in small streams would derive a greater benefit if the proposed per-acre basal area was 100% of the large stream target rather than 75%. In general, riparian areas should remain as un-impacted and wide as possible because of the dynamic links among the stream, riparian area, and upland forest. The riparian area helps buffer the stream from upland impacts (run-off, chemicals, sedimentation, etc.), assures a stable stream morphology, allows recruitment of large wood and resulting channel complexity, provides temperature control, and supports the movement of organisms among areas.

Thank you for the opportunity to comment on this important rule concept. Please let us know if we can help with future reviews. The Oregon Chapter of the American Fisheries Society is comprised of over 400 fisheries and aquatic science professionals from federal, state, and tribal agencies, colleges and universities, and diverse private employers, including students and retirees. The Chapter was established in 1964 as part of the American Fisheries Society. Our mission is to improve the conservation and sustainability of Oregon fishery resources and their aquatic ecosystems for long-term public benefit by advancing science, education and public discourse concerning fisheries and aquatic science and by promoting the development of fisheries professionals.

Sincerely,

A handwritten signature in black ink that reads "Douglas E. Olson". The signature is written in a cursive style with a large, stylized 'D' and 'O'.

Doug Olson

President
American Fisheries Society
Oregon Chapter