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Title:

Comments: While old growth (og) trees provide important terrestrial habitat and other values, their presence as large woody material in streams, particularly in eastern Oregon, is likely important for reasons well understood and, also, emerging. They likely provide in-stream structure, behind which gravels and cobbles accumulate, to form in-channel hyporheic zones. Stream flow that passes through these gravel accumulations is likely cooled, which is an important process in the climate and highly altered streams of eastern Oregon, where summer temperatures can be hot enough to influence survival of ESA-listed (threatened) steelhead trout. (NOTE: vegetative shading that reduces solar loading only maintains temperature; it does not cool water). Large wood (>30 inch, or even 21 inch dbh) is exceedingly rare in these streams due to historic harvest processes (old, large stumps are common along streams) and active removal. The diminished size of in-channel hyporheic zones formed behind smaller trees or even behind jams of smaller trees are unlikely to provide the degree of cooling historic ones did (only a few remain). The OG amendment should provide a process to allow large trees, with or without root wads, located in aquatic management zones or on hillslopes (uplands) to be collected and used for placement in streams to improve stream temperature in or upstream of fish habitat or to improve other parameters of aquatic organism habitat. The process should be straightforward, logical, "easy" to document and not cumbersome since the historic loss of these trees along stream sides has degraded water quality (temperature) and aquatic organism habitat.