June 5, 2020

Sherri Chambers, District Ranger:

The Steamboaters and The North Umpqua Foundation are pleased the Forest Service is working to enhance development of late-successional forest conditions in previously managed stands (plantations), riparian reserves within plantations, and to improve the water quality in the Frank and Jeanne Moore Wild Steelhead Sanctuary. The Steamboaters and the North Umpqua Foundation have been heavily invested in this area for years, enhancing the fishery values. We also worked hard to secure the congressionally mandated special management area status and want to see this area managed according to the spirit of that designation.

We are glad you are focusing on restoration work in the plantations. We are aware many of them are overstocked and believe past thinning efforts in the Steamboat watershed have had positive results. We agree some of the riparian reserves are also overstocked plantations and could use some thinning and species diversification. We also know that past harvests have altered the morphology of both the perennial and intermittent streams and all are lacking in large woody debris. We strongly feel that "excess" trees in the riparian reserves should be tipped into the stream channels instead of commercially removed. As you know, restoring large woody debris not only improves fish habitat but traps sediment, slows flows, and forces more water underground — all of which improves quantity and quality of streamflow during warm summer season.

We applaud your road analysis focusing on stream impacts but we do not believe your analysis went far enough. The Frank and Jeanne Moore Wild Steelhead Sanctuary specifies that the Forest Service administers the area in a manner that maintains or enhances the watershed as a thermal refuge for wild salmonids.

The road network has a large, negative effect on water and stream quality. It appears you did a good analysis from the perspective of fish passage and erosion control but you need to analyze the roads from a ground water interception perspective as well. Many of your stream side and mid-slope roads force the upslope groundwater to the surface where it warms and runs off quickly — depriving the streams of a critical cold water source during the hot, dry summer. We urge you to analyze your stream side and

mid-slope roads in this context and decommission the worst offenders in a manner that restores natural ground water transportation.

There is also considerable evidence that high road density is incompatible with healthy watersheds. Please review the study “Long-Term Changes in Low-Flow Channel Widths Within the South Umpqua Watershed, Oregon” by Dose and Roper. It is in Vol. 30, No 6 of Water Resources Bulletin, dated December 1994. One conclusion is that streams were measurably impaired in watersheds with greater than two miles of roads per square mile. Your project area should have less than 83 total miles of roads to meet this criteria. Instead of improving roughly 120 miles of roads in the project area, we strongly recommend decommissioning at least 40 miles of the stream side and mid slope roads with the greatest ground water interception impacts and improving the remaining 80 miles. The Steamboaters and the North Umpqua Foundation are willing to help identify roads for decommissioning while maintaining adequate access for fire, management, and recreation.

Thank you for considering our comments and we look forward to working with you into the future as we have done in the past.

Karl Konecny
TNUF and Steamboat Board Member

Becky McRae
TNUF President

Tim Goforth
Steamboat President