Jennifer Erickson

Ruth D'Amico

Danika Carlson

Klamath National Forest

USFS

Re: Red Bank Habitat Enhancement Project #56532 Scoping Description, June 2020

June 28, 2020

Dear all,

Thank you for stewarding our public lands. I am encouraged and grateful that your work to improve forest and river conditions continues, even as our nation endures divided times and a pandemic.

The rivers of California held millions of salmon and steelhead in my father’s childhood. In my own childhood their numbers were reduced by an order of magnitude. And as I raise my own children I fear for their very survival. There’s no reason, save our own will, that we cannot restore at least some of that natural bounty. And it seems we have decided to reverse their decline, though progress occurs on a painstakingly slow timeline.

Below are comments and questions regarding the Red Bank Habitat Enhancement Project scoping document / Project Description. Thank you for your time and consideration. I do hope you find them useful, and that perhaps someday young coho will as well.

I am enthusiastically supportive of the project concept and scope. The need to provide these habitat features is clear and the location seems well suited to the proposed actions. The activates provide very limited disruption to any existing habitat, beyond the access road crossing the the river. The use of on-site materials, including the ~30 trees proposed for removal is appropriate. Uprooting and use the root wads from these trees is preferred over tree cutting.

The Proposal includes this text, that includes a note about fluvial processes:

*“The Salmon River Floodplain Habitat Enhancement and Mine Tailing Remediation Project Phase 1: Technical Analysis of Opportunities and Constraints, identifies the site as a high priority for treatment in order to enhance the long-term viability of fluvial processes and fisheries on the Salmon River (Stillwater, 2018).”*

There is no mention in the Proposed Action section regarding fluvial processes, which I understand to be motion of sediment, or erosion / deposition of sediment. Can subsequent documents provide details on how this project might or might not affect fluvial processes in this reach of the river?

Also, I note the date stamp on the Map of Proposed Action is over 5 years old. I would encourage an evaluation of any changes to stream channel alignment, elevation and vegetation over these years, as there have been several significant high flow events during this time. Additionally, I expect there have been learnings from other habitat enhancements in the last five years that can be used to influence and improve on this plan.

A re-evaluation of opportunities and actions seems prudent, especially with regards to any grading that may be needed at the divergence and convergence of the side channel from the main channel.

During such a re-evaluation or during the drafting of more detailed plans I suggest evaluation of additional habitat features. Additional backwaters on the riverbar at SR 14 and SR 6/7 (references are to markings on the Map of Proposed Action). These features would be similar to Backwater 2 in the Map of Proposed Action and could increase riparian shading and afford additional habitat, flow refuge and thermal refuge under moderate flow conditions. It appears there is also an opportunity to add habitat features to the bar on the NW bank of the SR immediately downstream of the confluence of the SR & SC. Including these features in the scope can provide additional habitat opportunities during the proposed temporal and disturbance footprint.

There is significant value in trying to quantify the value of habitat created. Such an evaluation isn’t really part of this document, beyond the generalities outlined in the Need for the Proposal and Proposed Action sections of the Project Description. I encourage supporting documentation to include information such as expected wetted area, duration of time the area is wetted, expected water temperature changes, time until habitat utilization, etc. with an outcome for number of juvenile fish supported. While these are unquestionably difficult to model the information can be used to balance cost and benefit, and to prioritize this action versus others under consideration. Monitoring in years following project implementation would allow model testing and refinement for subsequent actions, and more certainty in their cost / benefit comparisons.

I look forward to reading and commenting on more detailed documentation, and hope to read a half dozen similar proposals for the North Fork in the coming years.

Best Regards,

Steve