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Dear Wild & Scenic River Planners:

Thank you for the opportunity to provide input early in the planning process for our newly designated Wasson Creek and Franklin Creek Wild and Scenic Rivers within the Devil's Staircase Wilderness. We, along with our 12,000 members and supporters, value these lands and the services they, as protected wilderness and wild rivers, provide for all living things.

Cascadia Wildlands, as part of a broader coalition of advocacy organizations, has worked since 2007 to bring public awareness and support to the effort to designate these lands for the strongest federal protections. Our members and staff have led dozens of trips through the years to this incredible area, and regard the Devil's Staircase, and the larger Wilderness area, as remarkable jewels of the wilderness preservation system. We also worked closely with the Oregon Congressional designation to help inspire their passion for protecting the area. We are immensely grateful for the alignment that cemented these designations, and we look forward to continued engagement with the agencies as management plans develop. We also encourage you to strongly consider any input on the management of this outstanding area from the Confederated Tribes of the Coos, Lower Umpqua and Siuslaw Indians (CTCLUSI) and other western Oregon tribes, as these are the traditional homelands of Oregon's first people.

Due to its unforgiving terrain, remote location and intact nature, we believe the Devil's Staircase Wilderness and WSR, together, are best managed for their own intrinsic value, providing immensely important, undisturbed interior habitat and cold, clear streams to the living creatures that call this place home. In a world where very few places have escaped the heavy hand of human management, this intact remnant of the Oregon Coast Range ecosystem has a value far beyond what it can provide to humanity.

And yet, an intact and relatively undisturbed ecosystem also provides almost immeasurable value to human health and the human spirit. Low-impact uses of the Wilderness and rivers, such as gathering traditional foods, wildcrafting, visiting spiritual sites, backcountry hiking, swimming, and other activities through which humans respectfully interact with this wild place, are best encouraged and supported by thoughtful management.

Other intrinsic values of a mostly-unmanaged Wilderness and wild rivers include myriad benefits to the living earth and by extension, to human society. These include the wilderness's carbon storage capacity, provision of clean water, imperiled salmon and wildlife habitat, and contribution to overall biological diversity. These values—increasingly rare in today's world—all contribute to human health and well-being.

Interior Habitat

The increasing importance of intact, interior mature forest habitat in a fragmented landscape leaves the Wilderness in a position of utmost importance. Research is clear that the continued decline of some of our most vulnerable wildlife species, such as Northern spotted owls, marbled murrelets, and Humboldt martens, is strongly correlated with a loss of unmanaged, large-block habitat. The Wilderness plays a crucially important role in the Coast Range landscape by providing this type of rare habitat, and we believe it should continue to be managed with this objective front of mind. In our view, this requires minimizing new infrastructure and edge creation, and requires removal and rehabilitation of existing, nonconforming infrastructure, especially old road beds on the edge of the Wilderness.

Recreation

To that end, we ask the agencies to prioritize review of a recreation management plan that maintains the Wilderness/WSR's primitive backcountry character. We discourage a management alternative that calls for building new trails or other permanent infrastructure, *especially a trail to the Staircase*. The Staircase is a rare and special feature, in part, because it is hard to get to. It has a unique, undisturbed character that is incredibly valuable as is. A trail to the Staircase would be the beginning of its demise. With a trail, sure to follow would be garbage, fire rings, broken bottles and other signs of human impact.

The Wasson Creek corridor has been designated with a "primitive recreation outstandingly remarkable value." This further highlights the need to maintain primitive recreation characteristics, because, as the River Values Report notes, "Personal challenge, isolation, and undisturbed surroundings are key elements of the recreation experience in the Wasson Creek drainage. There are limited opportunities for this wilderness experience in the region of comparison, and Wasson Creek is recognized as one of the foremost settings for this type of recreation." (p. 15.) As visitors ourselves, we agree with "visitors' notes" concluding that "Wasson Creek's rugged and remote setting is a key part of the experience for those who make the trip to the Staircase." (River Values, Report, p. 15.) Franklin Creek, while not designated with a "recreation" outstandingly remarkable value, (p. 16), is still remarkable for its intact nature, and we encourage planners to continue to emphasize management for its rugged and primitive backcountry condition.

We support the "proposed desired conditions" for the creeks that include:

A primitive recreation setting is maintained: The area is characterized by an essentially unmodified, natural environment. Concentrations of visitors are low, and evidence of human use is minimal. The area has high opportunity for isolation, solitude, exploration, risk, and challenge.

The area provides outstanding opportunities for solitude, exploration, personal challenge, self-reliance, viewing wildlife in their native habitat, and immersion in a natural setting. Wasson Lake provides an opportunity for a more social and primitive camping experience.

The sights and sounds of modern human civilization are not apparent, except limited or infrequent encounters with other visitors. Visitors also have opportunities to experience dark skies, and these dark skies contribute to the overall sense of remoteness and ruggedness.

(Scoping Packet, Table 4.) We believe meeting these desired conditions means maintaining a trail-less recreation experience. The scoping documents indicate that “Designated trails should only be constructed if monitoring indicates an outstandingly remarkable value is being adversely impacted and is at risk of being degraded.” (Scoping Packet, Table 5.) If future monitoring should indicate the agencies might begin consideration of trail building due to some degradation, please provide public notice and an opportunity to comment on any plans.

If a trail-access alternative will be considered in the EA, the agencies should consider whether any need for trail-based access to the Wilderness could be provided by the existing alignment of Forest Service Road 4100. This east-west route would allow trail-hiker access to the backcountry while still maintaining the primitive backcountry experience of an off-trail adventure to the Staircase or other sites, and minimizing impacts to the Staircase or other likely popular destinations.

Regarding Table 7 in the Scoping Packet, please clarify in the EA what is meant by the following potential management action: “Designate and maintain user-built trail to Wasson Lake. Designate one user-created route and block and rehabilitate the others.” Wasson Lake, as the headwaters of the Wasson Creek system, should be maintained in as primitive a state as possible, and we would discourage any official sanction or designation of a trail to access the lake. The existing vehicle pullout and 200-yard trail to the edge of the lake provides an adequate opportunity to view and experience the headwaters of the system.

Additionally, we would suggest a very careful use of signage so as not to encourage irresponsible recreation. We firmly discourage signage indicating the location of the Staircase or other potential backcountry attractions in order to maintain the area’s wild character, reduce risks to human safety that might be encountered by unprepared hikers, and minimize other aspects of human disturbance including human-caused wildfire risk.

Land and Water Conservation Fund Acquisition

We are aware that through a cooperative funding agreement with Ecotrust Forest Management, the Siuslaw National Forest was able to acquire former Roseburg Forest Products inholdings within the Wilderness boundaries at the mouth of Wasson Creek. We are pleased with this wise use of Land and Water Conservation Fund (LWCF) dollars, and look forward to hearing how the management plan will propose to integrate these parcels into the Wilderness, both in an ecological sense and in terms of public access. We encourage one-time, variable-density thinning and other restorative treatments, including improving instream habitat and road obliteration, in these newly acquired tree farms on the north edge of the Wilderness.

We also encourage the agencies to acquire additional private land adjacent to the Wilderness through LWCF dollars and other monies when possible, particularly the Roseburg Forest Products parcels in the upper Wasson Creek watershed, and we suggest that a plan for doing so be incorporated in the upcoming analysis and the Siuslaw National Forests' larger lands acquisition strategy.

Existing Roads

The agencies should carefully evaluate where and when roads up to and along the edge of the Wilderness ("cherry-stem" roads) can be decommissioned. Roads no longer serving a purpose for public and/or commercial access should be strategically rehabilitated to provide a wide range of ecological benefits to the Wilderness and surrounding lands and watersheds. The scoping materials indicate that the agencies will undertake an analysis to determine whether and where existing roads have hydrological connectivity with the WSR. We look forward to reviewing this analysis and encourage decommissioning and rehabilitating all roads within the Wasson and Franklin drainages that have the potential to impact the WSR. Additionally, decommissioning unneeded roads to the Wilderness would discourage illegal vehicle trespass, invasive species proliferation, trash dumping, human-caused wildfire, and other nonconforming uses.

Streams

Some of the tributaries to Wasson and Franklin Creek do originate outside the Wilderness boundaries. Inasmuch as management activities on those stream reaches are under the control of BLM and USFS, we encourage the agencies to manage there for downstream impacts to the WSR.

Of note, Franklin Creek remains "impaired" for exceeding water temperature standards per the Clean Water Act, section 303(d). (River Values Report, p. 11.) This remains a concern in this rare, intact stronghold for native fish, and we encourage the agencies to prioritize remedies.

In addition to Wasson and Franklin Creeks, numerous small and pristine streams flow through the Wilderness, and we are glad that they have been enclosed within these new, protective designations. We encourage the agencies to manage the additional lands under their jurisdiction, but outside the boundaries of the Wilderness, in such a way as to eliminate direct and indirect impacts to waterways within the boundaries. Such efforts could include forgoing management activities along waterways that originate outside the Wilderness but flow into it at some point along their course.

Climate Change

Mature, intact temperate forests of the Pacific Northwest provide carbon-sequestration services comparable to the Amazon and other tropical rainforests. As such, we value this large remaining block of unlogged, mostly-unroaded forest – that shelters cold, clear fish-bearing streams – for its contribution to carbon uptake and storage.

But beyond climate mitigation, as one of the few intact, large blocks of habitat in the Coast Range, the Wilderness can provide a refuge for species as the climate changes in decades to come. The

steep and varied terrain provides an array of microclimates and a gradient of ecological conditions that allows species to find their niche as the climate changes. And, the Wilderness provides a crucial habitat connectivity linkage that will play a major role as species adjust to new climate conditions, including our native fish.

Adjacent industry-owned lands, heavily altered by human management, have a greatly reduced capacity to provide refugia in a warmer, drier future. This leaves our new Wilderness and protected waterways, with other protected Coast Range areas, to shoulder the burden of serving as a lifeboat going forward. We therefore encourage the agencies to plan for restoration and rehabilitation as needed, followed by minimal management and impact to leave these areas fully functional for this critical purpose.

Conclusion

We appreciate the agencies' early invitation to weigh in on the initial planning for our new Wilderness and Wild and Scenic Rivers in the Oregon Coast Range. We look forward to continued engagement throughout the planning process, and welcome your questions or a field visit at any time. This area is very important to not only our members across the region, but to a wide range of citizens and local and tribal governments, as well as to elected leaders who worked tirelessly to bring this designation to fruition.

Please keep us informed of future engagement opportunities.

Sincerely,

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