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RE: Wasson and Franklin Creeks Draft Comprehensive River Management Plan EA

Dear Wild & Scenic River Planners:

Thank you for the opportunity to provide further input into 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 finalize and enter implementation.

Cascadia Wildlands salutes the collaborative interagency and stakeholder effort that produced this draft plan. We believe the plan, as written, reflects that collaborative spirit and upholds the values of the federal legislation that designates protections for these irreplaceable Coast Range treasures. We thank the agencies for their attention to detail and thoughtful planning here. 2

We remain particularly supportive of the draft management plan's provisions to retain the wild character of the WSR corridors and the larger Wilderness area. These measures include, among others, the plan to limit recreational access as described, to refrain from adding new infrastructure like designated trails and signage, and to closely monitor and adapt management for ongoing and future usage impacts like social trails, garbage,

and fire rings.

Land-Use Allocations

Regarding potential boundary adjustments for the WSR river corridors, we are not clear on exactly which BLM land-use allocations (LUA) overlay which portions of the Wasson Creek headwaters and tributaries that originate outside the Wilderness boundaries. We understand that the interagency team determined that existing designations would adequately protect the WSR values for Wasson Creek, with a range of potential LUAs given, including late successional reserve, riparian reserve, and Areas of Critical Environmental Concern. If possible, please include in the final EA a detailed map showing the LUA overlays for the non-Wilderness, BLM-managed portions of Wasson Creek and its tributaries.

In the spirit of improving habitat and water-quality conditions in the LSRs and riparian reserves more broadly across the Coast Range, our organization has occasionally engaged with Coos Bay BLM regarding projects proposing quite heavy management within the reserves. If those non-Wilderness sections of the Wasson Creek headwaters and tributaries are also protected as ACECs in addition to any LSR/RR designations, then any concerns would likely be alleviated. Perhaps the agencies could reconsider adding one or more small expansions of the WSR corridor onto non-Wilderness BLM land for any non-ACEC reserve segments.

Land Acquisitions

We were pleased to read that the Siuslaw National Forest is in the process of acquiring the 2,598-acre Wasson Forest parcel just outside the Wilderness boundary and will be managing it as a late-successional reserve. We look forward to engaging with the agency on planning for this new acquisition. We encourage acquisition of additional buffer parcels surrounding the Wilderness, as well as beneficial infrastructure removal or remediation work near the Wilderness boundaries.

Is BLM developing any acquisition opportunities for private checkerboard lands upstream of the Wilderness? If not, does the agency foresee any prospects for doing so? T21S, R09W, sections 16, 20, and 30, as well as T21S, R10W, section 36 appear integral to full protection for the Wasson Creek watershed.

Conclusion

We appreciate the agencies' invitation to weigh in on the initial planning for our new Wilderness and Wild and Scenic Rivers. We look forward to continued engagement throughout the planning and implementation process, and we welcome your questions at any time. We further support the potential inclusion of advocacy groups[mdash]like ours and others[mdash]with a long history of involvement in the 3 larger Devil's Staircase effort, in future collaborative management efforts including citizen-science projects and messaging. Please don't hesitate to contact Cascadia Wildlands for input and assistance with these types of proactive efforts to benefit the Wilderness and Wild & Scenic Rivers in years to come. 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.

Sincerely,

Rebecca White

Josh Laughlin

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