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Title: Wildlife Habitat Biologist

Comments: RE: Wild and Scenic Area River Scoping

As the agency mandated with management of Oregon's fish and wildlife (ORS 496.012), the Oregon Department of Fish and Wildlife (Department) is responding to your July 22, 2019 request for scoping comments on the Wild and Scenic River Planning project.

The User Capacity Report (Report), prepared for the Wild and Scenic River Analysis, notes increased recreation use, and associated road and trail densities has diminished the value of wildlife habitat throughout the region. These issues have cumulative effects that will likely increase with human population growth.

Thus, the Department would like additional information added to the plan to address the following concerns and questions:

? While the first section of the Report explains the general process for estimating user capacity, the overall management plan could be improved by adding an ecological rationale for the desired capacities for each river/segment. For example:

- o How is river capacity assigned?

- o How does the capacity of campsites get estimated?

- o Is there an ecological rationale for why these are the desired capacities?

- o What is the rationale behind keeping the threshold capacity at current campsite numbers?

? When user thresholds are established, please provide specific information about how this will be accomplished including a timeline. For example how will access be blocked to reaches with spawning fish? How will personnel time be funded for blocking access? Will there be funding for enforcement?

? What does disturbance being "great enough" mean on page 12 of the Report? How will it be evaluated?

? What are the mechanisms for restoring disturbed areas and closing them to future use?

? What criteria must be met to categorize facilities as sustainable?

Thank you for the opportunity to comment. The Department appreciates your efforts to maintain and improve our Wild and Scenic Rivers and would be happy to offer any input needed throughout this process.