Data Submitted (UTC 11): 7/28/2018 2:37:24 AM
First name: Petey
Last name: Brucker
Organization:
Title:
Comments: Dear US Forest Service,

Please accpet my comments for the  Kelly Bar Habitat Enhancement project. I have been to the site many times, as I am familiar with tbe project and area surrounding it. Based on my review of the selected alternative, this meets the purpose and need statements for the proposed project. The analysis shows that the project will enhance complex, currently damaged habitat in a floodplain. This restoration project is essential for improving habitat conditions for multiple anadromous fisheries on the Salmon River.

Survey data shows that juvenile coho and spring-run Chinook use Kelly Bar and nearly all of the tributaries and their associated refugia on this reach of the North Fork Salmon River.

Suitable spawning habitat can be limited in the main river channel and therefore improving off-channel habitat will benefit adults, which spawn when flows are high. The Kelly Gulch river bars currently have very poor quality off-channel and side channel habitat, with limited connection to the river during high flows, enhancing those areas will provide much needed habitat on a river reach essential to coho and spring-run Chinook.

Extensive restoration effectiveness monitoring will be conducted for this project, which will provide valuable insight into how specific features of the project perform and provide refugia for fisheries. Evaluations of the project will also inform future restoration projects on the Salmon River.

If items of concern arise, consultation with the project team members, and/or other agencies, would occur in order to determine if maintenance action is warranted. I am confident that the project will be well studied, any issues resulting from the project will be addressed adequately, and the effects of the project will be essential in guiding the long-term efforts to restore at risk fisheries throughout the Salmon River.

* This project meets the restoration objectives identified in NMFS's Final Recovery Plan for the Southern Oregon/Northern California Coast Evolutionarily Significant Unit of Coho Salmon (Oncorhynchus kisutch) by meeting Task item SalR.2.1.7 (2014).

* The project works toward meeting the goals of the NCRWQCB's Total Maximum Daily Load for Temperature and Implementation Plan (2005). This project meets the USFS' Forest Plan Aquatic Conservation Strategy Objectives by aiding the recovery of fish habitat, riparian habitat, and water quality (6-46). The Recovery Strategy for California Coho Salmon (CDFG, 2004) identifies projects like this as a high priority action in the Salmon River watershed (SA-HA-09).

* This project clearly meets the recommended actions in the Klamath

Project Biological Opinion for coho salmon, Appendix C Restoration Project Type 5, Creation of Off-Channel Ponds/Side Channel Habitat, as it will re-connect side-channels and improve off-channel alcoves and ponds (NMFS and USFWS 2013); creating much needed habitat complexity and refugia for coho and spring Chinook populations at high risk of extinction on the Salmon River.

* This project is identified as a high priority for restoration in Appendix B Opportunities and Constraints in Potential Floodplain Habitat Enhancement Segments, segment NF23b sta 64,850 (1).

* This project will meet the goals and objectives of multiple watershed recovery plans for the state of California, including the State Coastal Conservancy's Strategic Plan (meeting objectives 6D and 6E); the California Water Action Plan by restoring important species habitat in the Klamath Basin (page 12); state planning priority AB 857 in the California @ 50 Million by increasing ecosystem services and biodiversity, as well as increasing resilient natural systems to recover from disruption; the California Climate Adaptation Strategy/ Safeguarding California: Reducing Climate Risk Plan by developing management practices to help safeguard species and ecosystems from climate risks by improving and protecting climate refugia; and the State Wildlife Action Plan, enhancing the degraded floodplain will meet conservation strategy goals (page 5.1-81).

* The Final SONCC Coho Salmon Recovery Plan states that summertime temperatures and lack of winter rearing habitat are the primary stressors for juvenile coho in the Salmon River (NMFS 2014). The Plan also identifies Kelly Bar as having high Intrinsic Potential for coho fisheries. Kelly Bar offers low gradient habitat that is known to host rearing juvenile coho and Chinook salmon, as do other nearby tributaries and refugial areas within the project vicinity. However, the river bar has been altered by historic mining and no longer provides much needed off channel habitat for coho salmon and other anadromous fish.

Implementing this project would address the NMFS recommendation of developing more year-round habitat for juvenile coho, and would additionally provide habitat for all anadromous fisheries in the Salmon River watershed.

The Salmon River hosts the last remaining viable run of wild spring-run Chinook in the Klamath Basin, a species with particular cultural significance to the Karuk Tribe and other tribes throughout the Klamath Basin. The SRRC has been working collaboratively with the Karuk Tribe, community members, and other interested parties for many years to actively protect and restore spring-run Chinook in the Salmon River. The persistence and restoration of this last remaining viable run of will spring-run Chinook in the Klamath Basin is essential in the fight to maintain this important species within the basin and will likely play an important role in the restoration of a viable spring-run Chinook population in the upper Klamath Basin post dam removal. This project

would advance those efforts.

Wild runs of coho salmon, spring-run Chinook, and summer steelhead still persist in the relatively unimpaired waters of the Salmon, yet they face a high risk of extinction. Coho salmon are listed as Threatened under the Federal Endangered Species Act (ESA), spring-run Chinook are currently being reviewed for listing under the ESA, and summer steelhead are listed by the state of California as a sensitive species that is of concern and at-risk of extinction. Increasing the available rearing habitat for juveniles of these species is of great importance for the future of salmonids in the Salmon River Watershed. Because these fish require winter slow water refugia and summer cold water temperatures for rearing habitat, increasing side channel habitat as well as riparian forest canopy are especially beneficial to the future health of this important species.

Implementing this project will provide much needed off-channel habitat for these imperiled species and I support this project.