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Comments: Umpqua Basin July 26, 2019

Douglas County, Oregon

Attention: James Capurso, USFS Region 6 Regional Fish Biologist

To whom it may concern,

We, the following signatories, support the R6 Aquatic Restoration Final EA. As current or former collaborative partners with the USDA Forest Service we have reviewed the EA and feel that a significant effort has been made to address both our own and other regional partners' concerns; issues which were duly articulated during the comment period. We are pleased with the extensive outreach effort made by Region 6 Forest Service to solicit public input and to respond accordingly.

It is our intention to continue working collaboratively with the USFS within the boundaries of the EA programmatic. We intend being consistent and proactive in our effort to present the latest findings, grounded in sound scientific research, to the Forest Service. What is more, we greatly appreciate the opportunity to participate in a partnership dedicated to an aquatic species recovery undertaking of this scale and scope. We feel that the USFS is sincere in its commitment to utilize best practices as part of its mandate to help conserve what remains of the ancient legacy of biodiversity on these watersheds, and to continue the work of rehabilitating degraded aquatic habitat, thereon. Where it may fall short of the high standard of good stewardship represented by the Final EA, we look forward to an open, honest and transparent means of providing input, as well as to an amicable resolution for the good of the agency, of our organizations and their dedicated memberships, and of the natural world as a whole.

Of particular concern for us today, are the dire implications of a widespread and chronically depleted summer low flow regime. Strongly inferred from the conclusions of the Perry-Jones 2017 Study (Perry, T.D., and Jones, J.A. (2016), Summer streamflow deficits from regenerating Douglas-fir forests in Pacific Northwest, USA, *Ecohydrology*, doi: 10.1002/eco.1790), which in turn were derived from decades of paired stream flow data acquired by the U.S.F.S. at the H.J. Andrews and South Umpqua (Coyote Creek) Experimental Forests, this issue looms existential for imperiled aquatic species, ESA listed or not, as well as for we human beings. It is our studied and firm opinion that this issue can no longer be ignored.

It has also come to our attention that 22 Oregon conservation organizations have submitted a petition to the Oregon Board of Forestry, which was accepted by the Board of Forestry on July 25th, 2019. This petition solicited a review of the Oregon Forest Practices Act regarding Oregon Coastal Coho Salmon recovery as it relates to current forest management practices. As we understand it, this review is intended to update OFPA rules and regulations for the express purpose of Coho recovery in the three Oregon State ESUs. We are hopeful that this rule-making process, if successful, will complement USFS efforts to recover this ESA listed species. If these much needed and scientifically up to date improved and recommended practices in the OFPA are realized, we trust that the USFS will support them, as they are discovered and disclosed in the updated OFPA.

We appreciate the identification in the EA of Upper & Middle Steamboat Creek and Copeland Creek in the North Umpqua River watershed. Low flows and warmer water temps are disproportionately affecting the summer steelhead for which NUR is famous. Addressing these factors is critical to the survival of this iconic run, as well as benefiting cutthroat trout and lampreys, both of which are far below historical numbers.

We, the signatories of this letter of support, wish to express our deep concern for the persistence of certain anadromous species within the Region 6 boundaries, and in the Umpqua basin in particular. The Coastal ESU Spring Chinook runs are experiencing a significant and long-running decline. The South Fork of the Umpqua River, as is true of too many other river systems rising in the Cascade and Coast Ranges, is in a degraded ecological condition, as are many of its aquatic denizens, including the Spring Chinook Salmon. We hope that this EA programmatic will allow for particular emphasis on prioritizing project support in these watersheds of concern.

Stanley J. Petrowski

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Joseph Patrick Quinn

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Steamboaters