



Native Fish Society

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The Native Fish Society is a forward-thinking organization guided by the best available science to advocate for historically abundant wild, native fish and promote the stewardship of habitats that sustain them

July 9, 2010

TO: Salem District, Bureau of Land Management

FR: Bill Bakke, Executive Director

Tom Derry, Molalla River Steward

Mark Schmidt, Molalla River Steward

Russell Bassett, Molalla River Steward

RE: Molalla River-Table Rock Recreation Area Management Plan draft

The Molalla River is a very important river to the Native Fish Society. The river has a strong native run of threatened Upper Willamette winter steelhead, a threatened run of UW spring chinook and a recovering population of resident trout. NFS is cooperating with the state of Oregon and the National Marine Fisheries Service to develop and implement a recovery plan for these species, and consultation with BLM in this effort is an important part of this recovery effort.

We are very appreciative of the partnership BLM has with NFS and the other nonprofits working on behalf of the Molalla Basin's ecosystem, and have enjoyed working side-by-side with BLM staff at river cleanups, tree plantings, trail work days and other activities. We are also grateful for BLM fish biologists' support of our angling regulation change to protect the river's fish populations, and the support given by your fish biologist and hydrologist for the N. Fork Large Woody Debris Project. We are hopeful that this partnership will lead to more fish restoration efforts on public land in the Upper Molalla River.

The regular presence of your caretakers in the Molalla River Recreation Corridor has made a huge difference in curbing many of the problems associated with this area, and we are very thankful for your commitment to include and expand this presence in the last five years.

We are also very grateful that you applied to acquire more lands to expand the Corridor and hope that you will continue and increase these efforts in the future.

The Native Fish Society is also grateful to BLM Salem District for creating the draft Molalla River-Table Rock Recreation Area Management Plan and Environmental Assessment. As mentioned in the plan, the Molalla River Recreation Corridor is becoming more and more popular, as each year sees more visitors. This increase in visitors creates additional strain on the ecosystem, and our hope is that the recreation management plan will address this concern both now and in the future.

NFS would like to support Alternative B, but we feel we can only do this if some provisions are added to the management plan. We do not believe, as currently proposed, that Alternative B will resolve identified issues associated with public safety and could actually make it worse for people camping in the Corridor. As Alternative B is currently

written, BLM caretakers (or camp hosts) are not present in the Corridor overnight. We believe this is crucial to achieving the following BLM goal: “Resolve identified issues associated with public safety.” In fact, we are concerned that Alternative B as drafted now could actually increase problems with public safety.

This following sentence makes Alternative B unacceptable, and we are unable to support this alternative if it is not changed: “No BLM personnel or volunteer host will be stationed within the recreation area under this (B) alternative.” The caretakers that are currently based out of BLM’s Maintenance Facility in the city limits of Molalla should be based in the Corridor. Without this presence, there will likely be disorderly and disruptive conduct at the campsites with no one to curb and stop it. We can envision many scenarios where rowdy campers disrupt the experience for all the other campers in that area. We are also concerned about the liability issues that occur with no camp hosts. Based on these likely negative outcomes of Alternative B, we cannot support it as currently written, and recommend that you adopt Alternative C that does call for overnight camp hosts.

NFS realizes that locating caretakers in the Corridor could create some additional cost to BLM, as the caretakers are currently provided electricity, water and sewage at the maintenance facility. However, we believe this presence is crucial and should be a priority for funding. Also, other public lands that BLM manages, including some campsites on public lands in the Deschutes River Basin, have camp hosts that stay overnight in these sites without electricity and water.

Ensuring that these camp hosts have communication with law enforcement should be a top priority of this plan.

There should be a riparian buffer between the campsites and the river, or at a minimum, ensure that river traffic is channelized onto one trail down to the river at each campsite. As the draft plan is currently written, there is not an adequate riparian buffer, and NFS encourages BLM to set the campsites back from the river a minimum of 100 feet.

We encourage you to charge a camping fee at each site. In order to provide for the hosts, this fee should be \$10-\$15 per night, per vehicle at a minimum. With the expected increase of user traffic in the Corridor, these user fees will help keep unlawful activity from occurring in the campsites.

In the draft plan, you mention that a “majority of dispersed day use locations remain open. Those with severe resource concerns (riparian area damage, vehicle trespass, etc) would be closed and rehabilitated.” We would like to see a detailed plan on which ones will remain open and which ones closed.

NFS is grateful that you plan to “improve consistency and appearance of visitor information including signage and kiosks. Develop one interpretive station within the main recreation corridor.” We encourage you to do this and highly encourage you to make replacing the vandalized road signs a priority of this plan.

NFS is also glad to see that you plan to “participate in cooperative law enforcement effort between BLM, Clackamas County and the City of Molalla Police Department.” The funding for law enforcement patrols currently conducted by the Molalla Police Department ends in two years. We encourage you to work with interested parties to continue this, even if it means paying for it with camping fees. We stress that this is vital to continuing the gains achieved the last five years in reducing lawlessness.

We are happy to see that you plan to have a seasonal closure of Pinecrest Road and encourage you to keep this road closed even longer than proposed. We would like for you to allow access to this road only during deer and elk bow and rifle season except for the first month of bow season. We purpose the road be open from Oct. 1-Dec. 31 and closed for the rest of year. Two areas on this road, including a shooting range, are now the biggest cleanup jobs in the Corridor.

NFS is encouraged by your plan to manage mining and encourage you to act on the public education and enforcement outlined in the draft plan. We also commend your efforts to retain course woody debris and snag, prevent loss of stream shading and protect natural ground cover.

We would like to know what evidence you have to support this statement:

“Recreation plays a relatively minor role in local economic conditions.”

In the fishery section of the draft plan you mention that the wild, native run of spring chinook has declined. The Oregon Department of Fish and Wildlife and National Marine Fisheries Service both consider this population to be extirpated. Also you mention that resident rainbow trout are introduced, which is not accurate. Trout stockings were discontinued more than a decade ago, and resident rainbow trout have always been present in the system. With the stopped stockings, catch and release regulations, and no-bait requirement the resident rainbow trout population is quickly recovering and will likely provide a catch and release fishery that gains popularity as the population recovers. Please let us know if you require supporting documentation regarding Molalla River fish populations.

The following is outstanding: “Recommended management to improve fisheries habitat in the Molalla River included riparian stand management to promote and accelerate older-aged forest characteristics, reducing the number of roads in the Molalla River basin, adding LWD to increase aquatic habitat complexity, and restoring flows to secondary channels by reconnecting floodplains. Additionally, mitigation of recreation impacts by hardening or limiting recreation access to streambanks, and designating camping areas was recommended.” NFS asserts that this is a vital part of the recreation management plan and encourages BLM to develop specific restoration projects to implement the recommended management.

In the draft plan, section 3.10 “Invasive Non-Native Plants and Botany” is missing. This needs to be included. NFS would like to know where you got the following information from: “All of the identified invasive species within the SRMA are highly dependent on high light levels and are poor competitors with native vegetation. To date the impact these species have had on the native plant community has been light and this pattern is expected to remain the same.” How did you get this information without actually listing the invasive species and documenting their presence? Also, based on the many non-natives we see proliferating many areas of the Corridor, we find it hard to believe. We would like to see a commitment from BLM to remove these invasives and replant with native vegetation.

We are very concerned that the draft plan does not include a budget. NFS would like to see a draft budget before the public input period ends.

NFS highly agrees with the following aspect of the draft management plan: “Implementation of recreation site development and access restrictions and restoration of closed sites, trails, and roads in conjunction with planned and projected fish restoration

activities in the Molalla River basin would likely cumulatively improve fisheries habitat in the Molalla River. Regulation of recreation impacts and development of designed infrastructure would limit or reduce sedimentation from ground-disturbing activities associated with recreation uses. Reducing recreation impacts to fisheries habitats by closing sites, trails, and roads would cumulatively add to projected fisheries habitat restoration actions.” We believe this holds more true for Alternative C than B. Alternative B represents a compromise between Alternative C and the current management, one that the Native Fish Society could live with if caretakers were staying overnight at the campsites. However, since Alternative B currently does not include the overnight presence of caretakers, we have no choice but to support Alternative C.

We have spoken twice in the past with members of the Mormon Church in the area who are interested in helping construct camping sites in the Corridor, and we would be willing to work with BLM to secure this free labor if caretakers are placed in the Corridor. We will also be willing to partner in fundraising through grant development, getting volunteers for events, and marketing of events.

Respectfully,

Bill Bakke, Executive Director
Tom Derry, Molalla River Steward
Mark Schmidt, Molalla River Steward
Russell Bassett, Molalla River Steward