Coalition of Salmonberry Fish Groups

N. COAST CHAPTER OF TROUT UNLIMITED | NATIVE FISH SOCIETY |
ASSOCIATION OF NW STEELHEADERS | WILD SALMON CENTER |
RAINLAND FLY CASTERS | WILD STEELHEAD COALITION

Oregon Parks & Recreation Department
Attn: Rocky Houston
725 Summer Street N.E. Suite C
Salem, OR 97301
July 25, 2014

Subject: Salmonberry Corridor Plan Development

Dear Rocky,

These comments are intended to help inform the draft master plan for the Salmonberry Corridor, to be released in September.

We support the concept of the Salmonberry Corridor. The project holds considerable potential for economic development in the Banks area and along the coast. The recreational potential of Northwest Oregon has long been undervalued in regional planning and land use; it is gratifying to see State resources directed toward enhancing recreational opportunity in this area.

Our comments from this point on are directed solely at the Salmonberry River section of the Corridor project (from Cochran to the Salmonberry River mouth) and the ecological health of this watershed and its salmon and trout habitat. In short, we believe development in the Salmonberry canyon should be limited to a primitive trail that requires as little new infrastructure as possible, and we oppose the return of active railroad service into the Salmonberry Canyon.

The Salmonberry watershed includes essential habitat for steelhead trout, summer and fall Chinook salmon, resident and anadromous cutthroat trout, and endangered coho salmon. The river is home to a winter steelhead run that is unique to the northern Oregon Coast Range in that returning adults often exceed twenty pounds. The Salmonberry run of wild winter steelhead is regarded as the healthiest run on the North Coast. It is likely that the Salmonberry's remote location and difficulty of access are contributing factors. It is this wild and remote character that makes the

Salmonberry canyon so appealing to those who know it; this character must be preserved. The steep canyon slopes and unstable ground that have made railroad maintenance prohibitively expensive will also prove difficult for trail construction and maintenance. For all those reasons, we support a minimally developed primitive trail through the entire Salmonberry section, as long as restoration activities accompanying trail development result in a net environmental benefit. Habitat in the Salmonberry needs to be improved, not caused to deteriorate further.

The Preliminary Feasibility Study (Walker-Macy, 2013) details numerous concerns with rail and trail development in the Salmonberry Canyon, citing steepness of gradient, overall elevation change, steep, landslide-prone canyons, extensive damage to bridges and trestles, the presence of a designated Aquatic Anchor habitat, the need for extensive environmental review due to impacts on salmon and steelhead habitat, the inevitability of periodic shedding of earth and vegetation, extensive permitting for in-water work, probable channel modification and reconfiguration.

In our opinion, an appropriate trail for the length of the Salmonberry Canyon would be the type described in the 2014 Salmonberry Plan Book as "adventure trail" (six feet wide, compacted soil surface). This type of trail would be the easiest and least expensive to build and maintain. Primarily hikers and mountain bikers would use it. Equestrian use in this section would be very limited regardless of the type of trail, due to limited horse trailer parking spaces, shuttle difficulties, and the distance from Reehers Camp. A primitive trail would help maintain the wild and remote character of the Salmonberry.

The steelhead spawning season in the Salmonberry extends into June, and the fish are easily disturbed by activity on the rail bed. We take great care to avoid disturbing them in spawning surveys, but this is a difficult endeavor. Heavy recreational use in the spring could have detrimental effects on spawning behavior. The same would be true in early fall, when the summer Chinook are likely to be spawning.

The trail should follow the existing rail bed, bypassing washouts and landslides. Where the rail bed is substantially intact but encroaches on the active river channel or cuts off a previous meander, bypass trails should be constructed in anticipation of the river reclaiming the historic channel.

The proposed plans call for removal of rails, ties, and ballast where the option is rail-to-trail. Except near Cochran and the confluence, this may be impractical due to limited access for equipment. In much of the canyon, soil movement and plant growth have already buried ties, and removal would cause considerable disturbance. Toxicity of creosote-treated ties is not likely to be much of an issue; much of the creosote has probably already leached out, a result of years of deferred maintenance. Removal of ballast would cause considerable disturbance. The potential environmental effects of removing rails, ties, and ballast must be considered carefully. Salvage value should not be the primary consideration.

Ballast that has washed into the river is probably contributing to pool filling and substrate embeddedness (due to its angularity); whether existing ballast is removed or not, we think it is inadvisable to import additional small, angular gravel for trail construction, as it is likely to end up in the river at some point.

Creek crossings (Kinney Creek, Belding Creek, and Bathtub Creek, for example) should consist of carefully located fords or log stringer bridges. Nothing should be built that would impede water flow. Culverts should be used only for facilitating drainage, and not for routing creeks, regardless of size.

Specific comments related to the "tiles" in the 2014 Salmonberry Plan Book follow.

Tile 15 –Baldwin

In this section, the primary water quality threat may be erosion of fine sediment into Pennoyer Creek. In sampling conducted in 1995, 1996, and 2010, the macroinvertebrate assemblage immediately below Cochran Pond reflected considerable fine sediment impairment. One major sediment source is probably the gravel quarry, which had a history of excessive sediment discharge and settling pond failures. Cochran Pond probably inhibits normal flushing of sediment in the low-gradient reach between the pond and the Salmonberry, accounting for the persistence of fine sediments long after the quarry was shut down.

Tile 17, 17A - Beaverslide

The proposed campsite development at Beaverslide may cause more problems than it solves. If the Beaverslide road is closed as ODF wishes, servicing and repairing infrastructure at this site will be very challenging. If the road is not closed, development of campsites will attract more motor vehicle campers than currently use the site, increasing the risk of overuse. Campers will want to build fires; unless firewood is imported for them they will use existing dead and live trees at the site. A horse corral and bike racks are overkill.

Tile 18 – North Fork.

The "North Fork trail" location is misleading. The trail (remnant of a legacy logging road) follows the North Fork much more closely than the map indicates. This trail will see heavy use, as it is the only "convenient" access to the middle Salmonberry. In springtime, the potential for disturbing spawning steelhead is high. The winter run in the North Fork lasts well into June.

The North Fork tunnel is unsafe. It would be better (i.e., cheaper, safer) to close the North Fork tunnel off completely and use the existing foot bypass route.

Tiles 20-23: Enright to Confluence

We strongly prefer the rails-to-trail option in this segment as well. As with the upriver sections, the trail should be the "adventure" type.

In our opinion, the Salmonberry Canyon is not an appropriate place for a railroad. Past attempts to provide profitable rail service have failed, even with maintenance being deferred.

The Salmonberry River is naturally constrained by steep valley walls; to facilitate railroad construction and provide a rail bed bench, the river was further constrained by installing fill and riprap at multiple locations. Historic meanders were filled. The increased water velocity and limited opportunities for the river to naturally meander have caused severe channel incision. The rail bed inhibits establishment of side channels in the lowest-gradient reaches of the Salmonberry, where side channel formation is most likely to occur. The rail bed also impedes the normal drainage of groundwater down the valley walls. The State has spent millions of dollars removing logging roads from stream bottoms for all the same reasons. It is safe to say that the railroad as currently configured could not be built legally today.

Thank you for the opportunity to comment.

Respectfully,

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