

October 30, 2007

Mr. Kim Larson
District Engineer
U.S. Army Corps of Engineer District, Portland
Attn: CENWP-PM-E
P.O. Box 2946
Portland, OR 97208-2946

RE: Comments on Draft Supplemental Environmental Assessment for Fish Passage Corridor, Elk Creek Project, Jackson County, Oregon, CENWP-PM-07-05.

Dear Mr. Larson:

American Whitewater appreciates the opportunity to comment on the Draft Supplemental Environmental Assessment for the Elk Creek Fish Passage Corridor Project. Our organization fully supports the proposed action to remove a portion of the concrete dam and realign the Elk Creek channel to its original alignment and gradient. This project will restore passage for both fish and recreational boaters.

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954. We have over 6,500 members and 100 local-based affiliate clubs, representing approximately 80,000 whitewater paddlers across the nation. American Whitewater's mission is to conserve and restore America's whitewater resources and to enhance opportunities to enjoy them safely. As a conservation-oriented paddling organization, American Whitewater has an interest in the rivers throughout the Rogue River basin, the downstream reaches of which were recognized as one of our nation's first Wild and Scenic Rivers. A significant percentage of American Whitewater members reside in Oregon and Northern California—a short driving distance from this watershed for recreation.

Located just a half hour from I-5, Elk Creek offers an idyllic escape from the bustle of nearby Medford. This Rogue River tributary drains a moderate-elevation watershed along the Rogue-Umpqua Divide, emptying into the Rogue five miles upstream of Shady Cove. Elk Creek winds through a gentle and remarkably pristine valley where lush stands of alder and cottonwood shelter abundant wildlife. In fact, this creek represents one of the best-preserved lowland valleys in the region offering opportunities for near-total solitude and high quality wildlife viewing during the winter paddling season.

Access to the river has proved a challenge as the partially constructed dam blocks downstream navigation. The road to a take-out half a mile upstream of the dam site is blocked by a seasonal gate (November 15th – April 30th). As outlined in the Draft Supplemental EA, restoration of the river channel at the dam site will allow paddlers to safely navigate through the site and take advantage of the high value paddling

opportunities this river provides. We request an opportunity to review any modifications to this plan that would leave structures in the river channel or otherwise impact safe downstream navigation.

In addition to the benefits for river-based recreation American Whitewater fully supports the restoration of fish passage. Historically Elk Creek has been, and it continues to be, one of the most important spawning tributaries for salmon in the Rogue Basin. Further delay in implementing this restoration plan will have negative impacts on the Rogue River's native salmon and steelhead. The proposed plan to restore the natural channel and provide volitional passage is the only fiscally responsible, biologically sound, and legally defensible method of providing fish passage at the partially completed dam.

Following completion of this project we look forward to future opportunities to comment on the management of federal lands upstream of the dam site. These lands provide extremely high value riparian habitat for native fish, elk, black-tailed deer, and other terrestrial and aquatic species. The opportunity to experience these lands is important to our membership and will improve with the implementation of this long overdue project.

Thanks for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. O'Keefe', with a stylized flourish at the end.

Thomas O'Keefe, PhD
Pacific Northwest Stewardship Director
American Whitewater

cc Governor Kulongoski
Congressman Greg Walden
Congressman Peter DeFazio
Senator Ron Wyden
Senator Gordon Smith