



Dean Finnerty
Oregon Staff

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Scottsburg, Oregon 97473
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Oregon Department of Environmental Quality
Attn: Aron Borok

Dear Aron,

Trout Unlimited is the largest and oldest cold water conservation organization in the United States with over 350,000 members and supporters nationwide, including thousands of members in Oregon. We also have approximately 20 full-time staff members working across the state on habitat projects and policy initiatives at the state and federal level.

I am writing to you today to share our strong support for the designation of an outstanding resource water for the Illinois River. Our staff and volunteers have engaged in and supported ORW's in the NF Smith and Steamboat Creek.

The Illinois River has many values in keeping with the values of our organization. Known for its rugged canyons, consistent cold flows, and steep tributaries, the Wild and Scenic reach of the Illinois is one of the very best rivers for wild winter steelhead in Oregon. It also hosts habitat for chinook, cutthroat trout, Pacific lamprey, and sturgeon, as well as "Critical Habitat" for federally threatened Southern Oregon-Northern California coho. Because the Illinois is one of few rivers on the West Coast where there is no hatchery supplementation program, it's an important refuge for the conservation of wild fish genetics. In particular, Silver Creek and Indigo Creeks are the most productive steelhead tributaries in the lower river and represent a very significant genetic core for wild steelhead populations of the Illinois and Rogue River basins. Other tributaries also host valuable habitat for steelhead and other native fish. In addition, the lower river's deep pools provide crucial thermal refugia for Rogue summer steelhead in warm summer months, increasingly important with climate change. The Illinois River's fish values are highly dependent on clear, cold, and consistent flows and deep pools.

The Illinois offers a diversity of exceptional recreational experiences, with people enjoying rafting, kayaking, swimming, camping, fishing, and hiking. Its "wild" section is reputed to be the most remote and inaccessible whitewater in the lower 48 states, featuring 150 rapids in 29 miles. The river's recreational values all depend on and are enhanced by high-water quality.

Climate change is negatively impacting our vitally important salmon and steelhead populations across our state. The cold, clean waters of the Illinois River are particularly important not only for the small communities of Cave Junction, but also for downstream communities such as Gold Beach and beyond. These salmon and steelhead produced in the Illinois - provide a wonderful recreational fishery, not only for the Rogue and Illinois, but also along our near shore coastal communities, infusing much needed tourism and recreational dollars for our "cash strapped" southwest Oregon communities. A 2021 study by the American Sportfishing Association

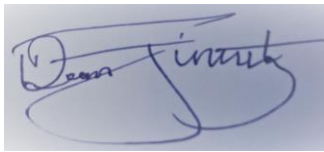
America's Leading Coldwater Fisheries Conservation Organization
Washington, D.C. Headquarters: 1300 North 17th St., Ste. 500, Arlington, VA 22209-2404
• Main Number: 703-522-0200 • FAX: 703-284-9400 • www.tu.org

calculated that statewide, anglers contributed \$1.5 billion to the economy and supported 13,120 jobs. Gas stations, hotels, restaurants, area fishing guides and other tourism industry services ALL benefit from increased returns of salmon and steelhead, provided by the habitat created by the waters of the Illinois River and therefore, must be protected.

For all these reasons, Trout Unlimited strongly supports this nomination for outstanding resource waters for the Illinois River.

Please feel free to reach out anytime if you have any questions or need additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dean Finnerty", is shown on a light blue background.

Dean Finnerty
Oregon Staff / Trout Unlimited



Southern Oregon

LAND

CONSERVANCY

PO BOX 954, ASHLAND, OR 97520 / 541.482.3069 / LANDCONSERVE.ORG

June 25, 2024

Aron Borok
Department of Environmental Quality
RE: ORW

Dear Aron Borok:

Southern Oregon Land Conservancy (SOLC), a land trust that works in the Rogue Basin, cares for two preserves in the Illinois Valley, the 110-acre Rough & Ready Creek Preserve near O'Brien and the 45-acre Eight Dollar Mountain Preserve next to the Wild & Scenic Illinois River. We also hold 13 conservation easements on 576 acres that drain into the Illinois River Watershed. We strongly support The Outstanding Resource Water of Oregon designation for Rough & Ready Creek and the Wild & Scenic Illinois River. It is critical to prevent further degradation of water quality and salmon habitat during a time of global warming and a biodiversity crisis.

Both preserves were recently transferred by The Nature Conservancy in April 2024 to SOLC. Our goal is to continue to care for them by working with volunteers in monitoring changes and removing nonnative invasive species, like alysse, reintroducing prescribed and cultural fire, and conducting ecological forest thinning. We also bring community members to the preserves for interpretive and educational hikes highlighting the fabulous serpentine (mantle rock) landscape and the numerous state-listed and endemic rare plants that live there.

Serpentine is only found on one percent of land; it is a rare rock that supports rare plants. This is a landscape under threat by land conversion from illegal marijuana grows, water theft, ORV use, and land use zoning that allows serpentine to be subdivided into 5-acre lots. Nickel mining has been a long-term threat to the region and the recent claims by a Canadian mining company further threaten the outstanding aquatic and terrestrial resources. In 1977, the U.S. Forest Service prepared a Study Report for the Proposed Illinois Wild and Scenic River. Five values were considered to be "outstandingly remarkable".

"These are the scenic, recreational, botanical, fish, and water quality values. The scenic and recreational values are closely associated to the river canyon, while the botanical, fish, and water quality values occur, and are reliant on, the entire river system."

Please consider protecting our natural heritage, our precious water and rare flowers, and designate Rough & Ready Creek and the Wild & Scenic Illinois Valley as The Outstanding Resource Water of Oregon.

Best Regards,

Kristi Mergenthaler
Stewardship Director, Southern Oregon Land Conservancy
kristi@landconserve.org, 541.482.3069 #105, landconserve.org

Board of Directors: Dan Thorndike, President; Molly Morison, Vice President; Heather Hickmann, Treasurer; Jeff Beaupain, Secretary; Gordon Gray; Jim Huber; Dan Kellogg; Donald Rubenstein; Kevin Talbert; Kris Wall. **Trustee Council:** Karen DeBoer; Paul Imperia, MD; Dan O'Connor; Judson Parsons, Sarah Sameh; Karen Smith, Nancy Tait; Bill Thorndike, Jr; Sam Whitford. **Staff:** Jennifer Abdo, Marketing and Communications Manager; Paul Belson, Conservation Project Manager; Rebekah Bergkoetter, Land Steward; Macy Canete, Office Manager; Alek Liston Dykema, Attorney; Paige Gerhard, Event and Volunteer Coordinator; Lyndia Hammer, Stewardship Manager; Tara Laidlaw, Education Program Manager; Kristi Mergenthaler, Stewardship Director; Steve Wise, Executive Director.



June 6th, 2024

Department of Environmental Quality
Aron Borok
Water Quality Permitting Variance Specialist

Greetings Mr. Borok,

On behalf of the Northwest Sportfishing Industry Association, we would like to provide this letter of support for the Wild & Scenic Illinois River Outstanding Resource Waters nomination.

NSIA is dedicated to the preservation, restoration, and enhancement of sport fisheries and the businesses dependent on them. In southwest Oregon, the Illinois River contributes roughly 25% of the flow of the lower Rogue River, which is a critical salmon and steelhead fishery. The combined river basin of the Illinois and Rogue is one of the most important sport fisheries in the Pacific Northwest outside of the Columbia, and contributes significantly to our regional economy.

The Illinois River subbasin has more than 250 miles of stream habitat used by anadromous fish for spawning and rearing (ODFW database, 1976). Winter steelhead potentially inhabit more than 300 miles in this sub-basin depending on flow. Coho salmon utilize approximately 100 miles of stream in the Illinois. Stream surveys conducted in the 1990s indicate considerably more miles of streams used by steelhead and coho than figures included in the 1976 database. The Illinois River provides diverse aquatic and riparian habitat for the following native salmonid fish stocks: fall chinook salmon, coho salmon, winter steelhead, sea run cutthroat trout, resident cutthroat trout and rainbow trout.

Thank you for this opportunity to support the nomination put forth by Friends of the Kalmiopsis, Kalmiopsis Audubon, and the Klamath Siskiyou Wildlands Center. Please reach out if you have any questions.

Sincerely,

Dave Strahan
Northwest Sportfishing Industry Association.
1711 E. Jones Cr. Rd.
Grants Pass, Oregon. 97526



June 4, 2024

Kathleen George, Chair
Oregon Environmental Quality Commission
700 NE Multnomah St. Suite 600
Portland, Oregon 97232

Leah Feldon, Director
Oregon Department of Environmental Quality
Oregon Environmental Quality Commission
700 NE Multnomah St. Suite 600
Portland, Oregon 97232

Dear Chair George and Director Feldon:

On behalf of Pacific Rivers, I write in support of the current proposal to designate 46.6 miles of the Illinois River, plus direct tributaries and associated wetlands, as Outstanding Resource Waters of the State of Oregon.

Numerous waters deserve consideration for inclusion in Oregon's nascent ORW program. Our highest quality waters deserve it. So do our waters of particular ecological significance, cultural value, and economic importance.

The ORW petition recently submitted by the Friends of the Kalmiopsis, Klamath-Siskiyou Wildlands Center, and Kalmiopsis Audubon Society makes a very strong case for the Illinois River.

The Illinois is a critically important tributary of the Rogue River. The Illinois Watershed (628,000 acres) comprises about one-fifth of the Rogue Basin and contributes approximately 25 percent of its flow.

The Illinois itself provides vast amounts of crucial habitat for fish and wildlife that are vital to the region's cultures and economies. It also provides cool, clean water that is crucial for the Rogue's aquatic life, including the salmon, steelhead and other migratory fish of the entire Rogue Basin. In today's warming climate, those values are more important than ever. They alone are more than enough reason to protect the Illinois through ORW classification.

There are other compelling reasons as well. They include all the "outstandingly remarkable" values that led to the designation of 50.4 miles of the Illinois in the National

Wild and Scenic River system. Those values are named but they are not all protected by federal laws and agencies.

To protect the Illinois' water quality and the fish, wildlife and people that depend upon it, the Illinois needs and deserves classification as an Oregon ORW. We urge your favorable consideration of the current petition to that end.

Sincerely,

A handwritten signature in blue ink that reads "Michael Morrison". The signature is fluid and cursive, with the first name "Michael" and last name "Morrison" clearly distinguishable.

Michael Morrison, Board Chair
Pacific Rivers