American Fisheries Society
Oregon Chapter
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January 27, 2004

Janine Castro
US Fish and Wildlife Service
2600 SE 98th Ave., Suite 100
Portland, OR 97266

Dear Ms. Castro:

This letter provides comments on behalf of the Oregon Chapter of the American Fisheries Society on the white paper entitled "Instream Aggregate Mining Issues in Oregon". In general, the paper is very well documented and informative about river processes and impacts from gravel removal. Many of the issues and impacts can be substantiated by our members. For instance, in the South Fork Coquille River, our direct experience indicates that adult fish migration and passage (page 10, section d) have been impacted by alteration of the river cross-section in the area of gravel removal operations. Wide, shallow riffles have been created that are often barriers to Chinook salmon. The Coquille River has a small, remnant run of spring Chinook salmon that is most vulnerable to shallow riffles, due to their late spring/early summer ascent into the basin. The earliest running fall Chinook salmon can also have difficulty in these areas when late summer flows are low.

Several issues not directly raised in the paper deserve comment. First, although fish passage is discussed, fish stranding is not directly mentioned. Adult and juvenile fish can be, and have been, stranded in mining-created pools or side channels that become isolated when river flows recede rapidly. However, the potential for such stranding may have be reduced in recent years by the bar sloping and leveling requirements of DSL (Oregon Division of State Lands) permits.

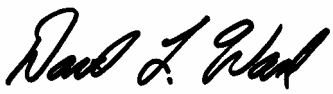
Also, although biological impacts are mentioned throughout the text, in the section where it seems all of them should be discussed (*Fish and Wildlife: Harm, Harassment, and Mortality*), only a small subset of the issues are mentioned. Expanding this section or referencing previous sections might be useful for those looking for biological issues.

Another issue you may want to raise even though it is more administrative is that pre- and post-removal surveys that are supposed to occur as a condition of DSL permits are either not done or are not reported. The absence of these reports means that annual gravel recruitment and river profile conditions cannot be determined for management purposes.

Finally it might be worthwhile to note that some of the major impacts described in the white paper (e.g., altered behavior of riffles and pools during high water, increased width:depth ratio, bank erosion, reduced sinuosity and stream complexity, etc.) may not be able to be solely attributed to gravel mining. Other activities, such as livestock grazing, removal of riparian vegetation, dredging, and water withdrawals may also contribute to these conditions.

Thank you for the opportunity to comment on this white paper. The Oregon Chapter of the American Fisheries Society is comprised of over 400 fisheries and aquatic science professionals from federal, state, and tribal agencies, colleges and universities, and diverse private employers, including students and retirees. The Chapter was established in 1964 as part of the American Fisheries Society. Our mission is to improve the conservation and sustainability of Oregon fishery resources and their aquatic ecosystems for long-term public benefit by advancing science, education and public discourse concerning fisheries and aquatic science and by promoting the development of fisheries professionals. Please let us know if we can help with future reviews.

Sincerely,



David L. Ward
President, Oregon Chapter
American Fisheries Society