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March 31, 2016

Debra Sturdevant
Oregon Department of Environmental Quality
811 SW 6th Ave
Portland, OR 97204
Submitted via web form: www.oregon.gov/deq/WQ/Pages/Standards/orwocomment.aspx

Re: North Fork Smith River–Outstanding Resource Water

Dear Ms. Sturdevant,

American Whitewater writes to encourage the Environmental Quality Commission to accept the petition it has received for designating the North Fork Smith River and its tributaries as “Outstanding Resource Waters” (ORW). We also encourage the EQC to direct the Department of Environmental quality to initiate a rulemaking proceeding towards this goal. The outstanding water quality of the North Fork Smith and its tributaries deserve the highest water quality protections that the Clean Water Act can provide.

American Whitewater is a 501(c)(3) non-profit organization with a mission to conserve and protect America’s whitewater resources and enhance opportunities to enjoy them safely. Founded in 1954, American Whitewater has over 5,300 members and 100 locally-based affiliate clubs, representing the conservation interests of whitewater enthusiasts across the nation. A significant percentage of our members reside in Oregon and Northern California, and enjoy paddling the Wild and Scenic North Fork Smith River. Many of our members also travel from throughout the country to enjoy this whitewater gem.

Our members place high importance on healthy and highly functioning riparian ecosystems, and value the crystal clear waters of the Wild and Scenic North Fork Smith and the critical habitat it provides for Fall Chinook, steelhead, sea-run cutthroat trout, resident rainbow and threatened SONNC coho. These qualities attract visitors from across the country, including whitewater enthusiasts and fishermen and women, supporting the regional recreation economy. The pure waters of the North Fork Smith also eventually provide drinking water for downstream communities in California.

Federal agencies have recognized the pure water quality of the North Fork Smith. The river was designated as a federal Wild and Scenic River in part because of its outstandingly remarkable water quality. The Forest Service also determined that Baldface Creek, tributary to the North Fork Smith, is eligible for inclusion in the federal Wild and Scenic system because of its outstanding water quality.

The North Fork Smith Watershed is comprised completely of public lands. Except for a few roads, the watershed remains pristine and undeveloped. Although 88% of the North Fork Smith's watershed in Oregon is designated either as Wilderness or Roadless Areas, 30,000 acres remain open to mining. An international mining company is currently proposing to develop a nickel strip mine here, threatening the water quality of the North Fork Smith and the Wild and Scenic Smith River downstream. As a result, designation as an ORW is timely, and would serve to safeguard the outstanding water quality of the river and the values it supports.

We note that Oregon has yet to designate an Outstanding Resource Water, and we believe that the North Fork Smith is an excellent candidate to begin with. California's water quality agency is also considering designating the Smith and its tributaries as Outstanding National Resource Waters through its Triennial Review process.

Thank you for your consideration.

A handwritten signature in cursive script, reading "Megan Hooker", followed by a horizontal line extending to the right.

Megan Hooker
Associate Stewardship Director