

# DRAFT

# Pilot State Scenic Waterway Management Plan

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## Molalla River

October 2015



Oregon Parks and Recreation Department  
725 Summer St NE Suite C, Salem, Oregon 97301



# Acknowledgements

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## Advisory Committee

- John Atkins, President, Molalla River Alliance
- Jerry Bailey, Confederated Tribes of the Grand Ronde
- Connie Derry, Glen Avon Neighborhood Association
- Pete Giordano, Blue Sky Rafting
- Jack Hammond, Molalla River Alliance
- Bob Loucks, Molalla Retreat
- Scott Marlega, Weyerhaeuser Company
- Mike McCallister, Clackamas County
- Jeffrey McCusker, Outdoor Recreation Planner, Bureau of Land Management
- Mike Moody, Molalla River Alliance
- Gary Potter, Canby Water Utility
- Mark Schmidt, Property and Local Business Owner
- Bill Taylor, Molalla River Watch (Watershed Council)
- Becky Wolf, Recreational User, Oregon Equestrian Trails
- Sam Wurdinger, Molalla Chapter, Northwest Steelheaders

## Staff

- Brenda Bateman, Technical Services Administrator, Oregon Water Resources Department (WRD)
- Andrea Berkley, Natural Resource Specialist, Oregon Parks and Recreation Department (OPRD)
- Dwight French, Water Rights Services Administrator, WRD
- Chris Havel, Associate Director, OPRD
- Laurel Hillmann, Natural Resource Specialist, OPRD
- Rocky Houston, State Trails Coordinator, OPRD
- Amy Kim, Watermaster, WRD
- Carrie Lovellette, Integrated Park Services Assistant, OPRD
- Rachel LovellFord, Hydrologist, WRD
- Kenneth Stahr, Hydrographics, Measurement, and Reporting Section manager, WRD
- Trevor Taylor, Stewardship Manager, OPRD

# Executive Summary

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## Background

The Oregon Parks and Recreation Department (OPRD) is responsible for administering the State Scenic Waterways Program, which is designed to protect the existing scenic, natural, and recreation values of 20 designated waterways throughout the State. OPRD is directed by statute (ORS 390.855) to periodically study new waterways for potential inclusion in the program, though no new waterways have been designated since 1988.

In September 2013, the Governor directed OPRD to analyze at least three waterways for potential designation every two years. An initial screening of all Oregon waterways by OPRD resulted in a list of approximately 80 river segments which have the potential to meet the State's waterway designation criteria. Based on a broad coalition of agencies and stakeholders, OPRD's capacity to complete the waterway assessments, and to provide geographical distribution throughout the State, sections of the Molalla, Chetco, and Grande Ronde Rivers were included in the 2013-15 pilot study.

In November 2014, the Oregon State Parks and Recreation Commission recommended designation of segments of the Chetco and Molalla Rivers. This decision was based on the waterway eligibility findings and public support. OPRD evaluated stakeholder and community input to gauge public support and understand issues and concerns associated with the potential Scenic Waterway designation. A webpage was established for the study to provide information on the waterway assessment process and to solicit feedback from the public. Community input was collected through a designated email address, an online survey and a local community meeting was to review preliminary findings, answer questions, and obtain public comments. All property owners with the study area received an invitation letter to the meeting and it was advertised through a news release and public notice in the local paper. Public input received at the community meeting and through written comments indicates that there is strong support for designating the study area into the State Scenic Waterway Program.

The Commission also directed OPRD staff to cooperate with local advisory groups to pilot test the development of draft management plans for the recommended scenic waterway segments on the Chetco and Molalla rivers, and append the pilot draft management plan reports to the existing scenic waterway qualification [reports](#) for Commission review by November, 2015. This document is that pilot draft management plan for a 13.2 mile stretch of the upper Molalla River, in Clackamas County, Oregon.

## Management Planning

The goal of the scenic waterway management planning process is to develop a comprehensive and workable management plan which will protect or enhance the special attributes of the designated river corridor. Primary emphasis is the protection of scenic, fish and wildlife and recreational features. The intent is to maintain the *existing* scenic condition of the area, without "turning back the clock" on existing land uses.

OPRD held two Advisory Group meetings (April 20, June 15) and one public workshop (July 20) for each waterway designed to obtain public feedback on the draft plans for the waterway. The Advisory Groups consist of local landowners, recreational users, local business owners, and local government members. Input provided in these meetings provided the foundation for the final recommendations contained in the draft management plan. A summary of public comments received is included in the Appendix.

In order to define and achieve management goals, if designated, the river is classified into one or more of six possible classifications according to the present level of land development, committed land uses, or landscape alterations (Fig. 3). Once the classifications are set, appropriate guidelines for new development or landscape alterations are established as rules. The major aim of the program is to maintain *the existing* scenic condition of the river. As proposed, the river would be managed (if designated and not altered during public rule-making) in three segments, a Scenic River Area from the Confluence with the Table Rock Fork to Pine Creek, a Recreational River Area from the Pine Creek Confluence to Trout Creek and a River Community Area from the Trout Creek Confluence to Glen Avon Bridge.

All new structures, improvements and development should be in compliance with the Public Use of Scenic Waterways Rules ([OAR 736-040-0025](#)) and Land Management Rules ([OAR 736-40-030 and 0035](#)) and be consistent with applicable BLM and Clackamas County land use and development regulations, along with proposed regulations specific to each management category. Additionally, a set of proposed management recommendations were developing including those about improving public access, interpretive information and signage.

Concurrently, the Oregon Water Resources Department (OWRD) staff began preparing a scenic flow recommendation to assist the Water Resources Commission in their consideration of designation of the proposed scenic waterways. Following designation (if that occurs), the Water Resources Commission will request that the Water Resources Department (WRD) identify flow quantities necessary for recreation, fish and wildlife uses before issuing new water rights within or above designated Scenic Waterways (ORS 390.835(1)).

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# Background

The Oregon Scenic Waterway Program, established by a ballot initiative in 1970, is administered under the authority of the Oregon State Parks and Recreation Commission through the Oregon Parks and Recreation Department (ORS 390.805 to ORS 390.925). The scenic waterway program seeks to preserve, protect and enhance scenic, recreational, fish and wildlife and cultural values possessed by each individual scenic waterway. The Scenic Waterways Act was created to strike a balance between protecting the natural resources, scenic value, and recreational uses of Oregon’s rivers on the one hand, and adjacent property rights on the other. Rivers can be added to the system through designation by the Governor, the legislature, or by the citizens of Oregon through ballot initiative. For example, in 1988, Oregon voters passed the Oregon Rivers Initiative (Ballot Measure #7), which added 573 river miles to the system. The state program currently includes approximately 1180 miles on 20 waterways (Figure 1).

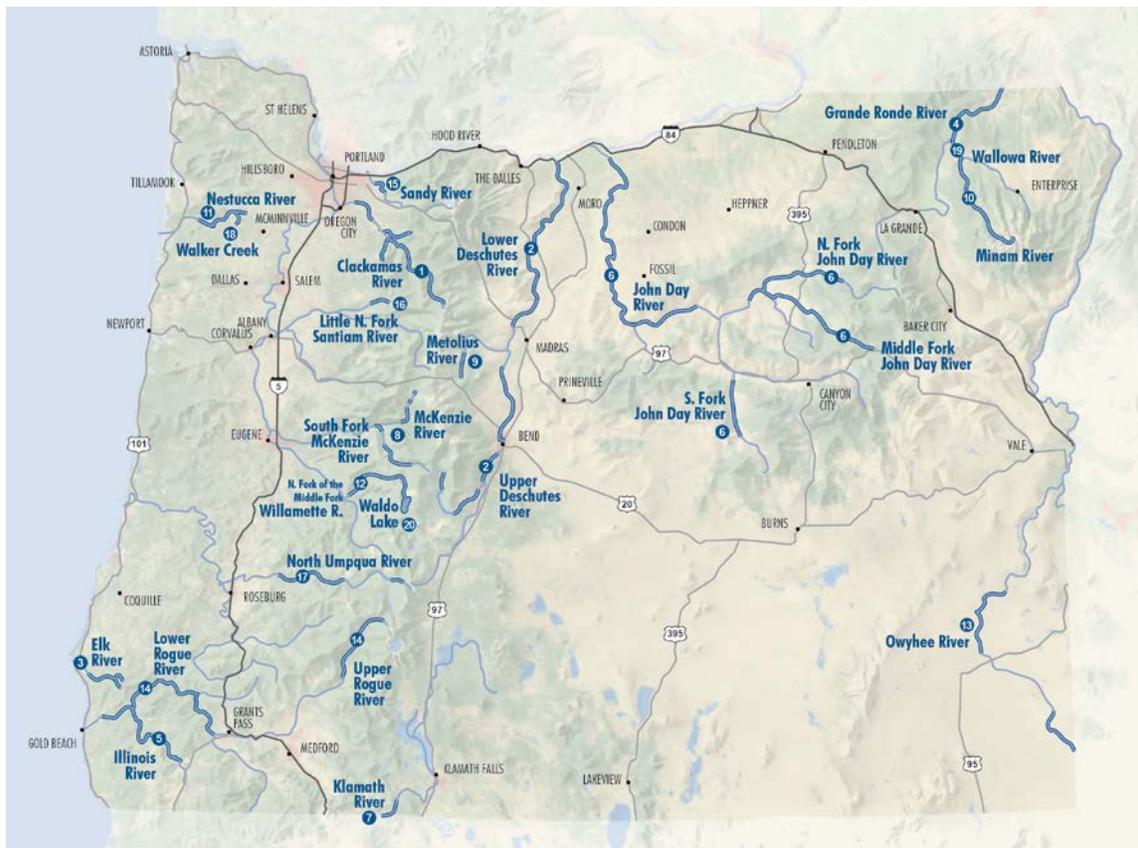


Figure 1. Oregon’s Existing State Scenic Waterways System

## Scenic Waterway Eligibility Study

Oregon Parks and Recreation Department (OPRD) is directed by statute (ORS 390.855) to periodically study new waterways for potential inclusion in the program, though no new waterways have been

designated since 1988. In September 2013, the Governor directed Oregon Parks and Recreation Department to analyze at least three waterways for potential designation every two years. An initial screening of all Oregon waterways by OPRD resulted in a list of approximately 80 river segments which have the potential to meet the State's waterway designation criteria. Based on a broad coalition of agencies and stakeholders, OPRD's capacity to complete the waterway assessments, and to provide geographical distribution throughout the State, sections of the Molalla, Chetco, and Grande Ronde Rivers were included in the 2013-15 pilot study. In November 2014, the Oregon State Parks and Recreation Commission recommended designation of segments of the Chetco and Molalla Rivers. The Commission also directed OPRD staff to cooperate with advisory groups to pilot test the development of draft management plans for the recommended scenic waterway segments on the Chetco and Molalla rivers, and append the pilot draft management plan reports to the existing scenic waterway qualification reports for Commission review by November, 2015. This document is that pilot draft management plan (see: The Management Planning Process). A summary of the eligibility study results is included below as background information.

### *Eligibility Study Purpose*

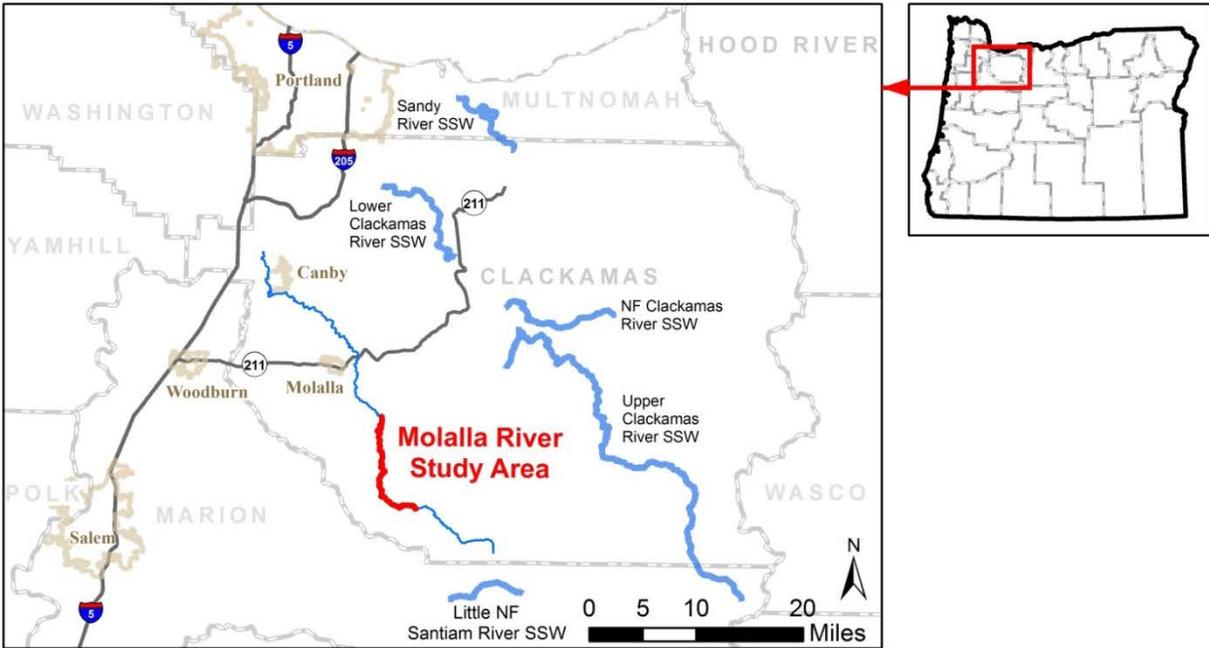
An Oregon Scenic Waterway study, initiated by OPRD in 2014, serves as the statutorily required first step in the process to possibly designate a new Oregon Scenic Waterway. That process, established by ORS 390.855, allows for the Governor to designate new scenic waterways following study and approval of the Oregon State Parks and Recreation Commission and the Oregon Water Resources Commission. The study, covering approximately 13 miles on the upper Molalla River, constitutes the first step - a report to the OPRD Commission. The study was done to accomplish two objectives:

1. Determine if the river segments meet the qualifications for designation as an Oregon Scenic Waterway (ORS 390.855); and
2. If the qualifications are met, outline, in *general*, what type of management designation would be appropriate for waterway, *if* it is found to be eligible, suitable, and ultimately designated.

### *Study Location and Area*

The Molalla River has its headwaters in the Table Rock Wilderness Area in the lower west slopes of Oregon's Cascade Range in rural Clackamas County, eventually flowing after around 51 miles into the Willamette River near Canby, Oregon. OPRD studied one ~13.2 mile upper river segment, beginning at the confluence of the Table Rock Fork and ending at Glen Avon Bridge, near the city of Molalla, Oregon (Figure 2). The study area ranges from a high elevation at around 1196 feet above mean sea level (MSL) to a low at the Glen Avon Bridge at 528 feet above MSL, with a drop of about 51 feet/mile. Other major rivers in the general vicinity include the Clackamas and Sandy Rivers, portions of which are both designated as both Federal Wild and Scenic and State Scenic Waterways. The study area on the Molalla River is shown below in red, in Figure 2 along with nearby State Scenic Waterways, shown in blue.

The Molalla River Study Area referred to in the scenic waterway study is defined as follows: The Molalla River Study Area referred to in this report is defined as follows: The Molalla River and all lands within ¼ mile of each bank, beginning at the confluence of the Table Rock Fork downstream approximately 13.2 miles to the Glen Avon Bridge, near the city of Molalla, Oregon.



**Figure 2. Location of the Molalla River Study Area in Clackamas Co., Northwest Oregon**

While the upper wilderness section of the Molalla River is characterized as having steep gradients, the lower thirteen mile study area is less steep as it flows through a series of pools riffles, and rapids (Bureau of Land Management, 1993). In some sections, the river narrows as it crosses through rock outcrops with interesting rock formations, including a dramatic basalt rosette. The steep hill slopes, canyon walls, and stream terraces of the Molalla River support a variety of riparian and upland vegetation characteristic of the botanically interesting and diverse Klamath Mountains Ecoregion. Major tributaries in the study area include the Table Rock Fork of the Molalla, Copper Creek Fork of the Molalla, Horse Creek, Bear Creek, Pine Creek, and Trout Creek. The North Fork of the Molalla enters the main-stem just below the study area. The upper study section is primarily composed of federal public lands, with some private industrial timberlands, while the lower portion is primarily private lands with a mix of rural residential development and forestry being the dominant land use types on private lands.

The free-flowing river provides drinking water for the residents of Canby and Molalla, is home to native fish runs including wild salmon and steelhead trout, and attracts a variety of recreational users. Only a day-trip away from the Portland and Salem Metropolitan areas, the Molalla offers recreational opportunities including fishing, camping, swimming/wading, kayaking, rafting, picnicking, scenic enjoyment and adjacent trail-use for hiking, biking, and horseback riding. Fishing for salmon and steelhead is at its peak once the rains start along with whitewater kayaking, which extends through the spring. In the summer, swimming, fishing, camping, sightseeing and picnicking are the major attractions (Bureau of Land Management, 1993).

The clear water, forested setting, and interesting geological features provide interest in the landscape and enhance the recreational experience of floating the river or enjoying its banks. Thousands of visitors

are drawn to the river for the geology and other scenic and recreational qualities of the river corridor. An approximately 15.1 mile portion of the upper river (and a section of the Table Rock Fork) has been proposed as a Federal Wild and Scenic River and there have been several bills in Congress over recent past sessions.

### *Waterway Eligibility Findings*

An evaluation of the various natural, scenic and recreational features of the study area was done. This information gathered following research, interviews and on-site observations was compared with the scenic waterway qualifications (i.e. free flowing; pleasing to look at, primitive, rural-pastoral; large enough to sustain recreation use without harming the recreational and natural resources). The criteria (ORS 390.855) were broken down into specific scenic, natural and recreational factors.

Based on the results of this evaluation, the entire study area meets the criteria (ORS 390.855) for eligibility as a state scenic waterway.

Free-flowing: The first criterion that must be met is that “the river or segment of river is relatively free-flowing.”

The Molalla River is completely free-flowing in nature in that it flows without impoundment, diversion, or major modification of the waterway along the entire study segment. The river is also naturally flowing (without dams or diversion) throughout the whole length of the river from the headwaters in the Table Rock Wilderness to the Willamette River (e.g., there are no upstream or downstream dams). Notably, it is the Willamette’s longest un-dammed tributary. The Molalla flows within natural banks, with the exception of minor cultural modifications made for the bridges and roads (e.g., some bank stabilization efforts including retaining walls). The river has generally regular and somewhat predictable flows, although as with almost all rivers in Oregon, flow various seasonally but derives from naturally occurring phenomenon, including precipitation, and to some extent, seasonal snow-melt.

Scenery: The second criteria that must be met is that the “scene as viewed from the river and related adjacent land is pleasing, whether primitive or rural-pastoral, or these conditions are restorable.”

The scenery as seen from the riverbank and the river in the study area ranges from moderate, but pleasing to exceptional river-scape views with unique geology and clear water in a mostly remote-feeling (although it is close to the road in parts), forested setting. The BLM notes that scenery on the Molalla River is an “outstandingly remarkable value” due to the resources of regional significance and proximity to major metropolitan areas, setting it apart from other rivers (Bureau of Land Management, 1993). Water clarity, interesting geology and hydrology combine to create the overall visual quality of the river corridor.

The few developments that do exist are quite localized so their visibility does not detract noticeably from the general natural feeling of the area. A few bridges cross the river, and other developments along the river include some visible impacts from timber harvest and a few residential homes on private lands, although most of them are at least partially screened as viewed from the river. The only property

with a visible structure as seen from the river (in the upper segment of the study area) is the one known as “Bee Ranch” located near the confluence of the Table Rock Fork (see photo, below). At the very end of the study area, a few more homes are visible from the river. In a few places where the road is close to the river, structures created for erosion control (e.g., retaining walls) are quite visible, albeit localized in nature. The remote feeling of the area combined with views of forested slopes and interesting geologic features combine to provide outstanding to generally pleasing views of the river and its surrounding scenery.

Recreation and natural resources: The final two criteria that must be met are that the river or segment of river and its setting must “possess natural and recreation values of outstanding quality” and be “large enough to sustain substantial recreation use and to accommodate existing uses without undue impairment of the natural values of the resource or quality of the recreation experience.”

The Molalla was listed in a 1987 study of recreational use of Oregon Waterways in which it was listed as having “outstanding recreational resources”, particularly for canoeing/kayaking, salmon and steelhead fishing and to a lesser extent (substantial to moderate) other types of boating including rafting, trout fishing, and “other recreation” which included hiking, swimming, camping and nature viewing (Oregon Department of Transportation, 1987). Boating, coupled with fishing and other activities reflects the importance of water dependent recreation and other water related activities on the Molalla River. The BLM estimates that approximately 50,000 visitors are attracted to the Molalla River corridor from the local and surrounding metropolitan areas, including Portland, Canby, and Salem (Bureau of Land Management, 2010).

The BLM notes that recreation on the Molalla River is an “outstandingly remarkable value” due to the river-related resources of regional significance and proximity to major metropolitan areas (Bureau of Land Management, 1993). Key recreational uses that were found to be exceptional include fishing, day-hiking, camping, non-motorized boating, picnicking, and swimming/wading. Recreational opportunities include day-use pursuits (e.g., hiking, scenic enjoyment, picnicking) and camping at newly developed BLM campgrounds, along with seasonal recreational fishing opportunities. Fishing, as allowed by fishing regulations (e.g., below Turner Bridge), is primarily from those that hike-in or fish from the banks from one of the many pedestrian access points on public lands. The BLM found that the “presence of year-round angling opportunities is important (Bureau of Land Management, 1993)”.

Recreational boating (e.g., kayaking, rafts and other float devices) is possible throughout this whole stretch during much of the year with multiple put in and take out spots on public lands. Boating is becoming increasingly popular in this section, with access possible via roads and floats possible for recreationists of a variety of skills levels, depending on the flow. During various water levels, kayaking the “3 Bears Run” is a regional favorite amongst intermediate to expert paddlers. Experienced whitewater kayakers, canoeists and some on rafts paddle the river during higher water months (typically Nov-May, depending on rains), when the challenging Class 3-4 (and higher depending on flows) rapids of the Molalla River “3 Bears Run” surrounded by unusual rock formations, including Mama, Papa, Baby-Bear, Porridge Bowl, and Goldilocks rapids are a draw.

Overall the recreation opportunities on this section of the river have the potential to be (and currently are) popular enough to attract visitors from beyond the local area, additionally they are relatively rare within the region with only a few rivers, like the nearby Clackamas, offer *somewhat* similar experiences. While several rivers in the region offer somewhat similar scenery, the diversity of recreation opportunities and year-round nature of recreation on this river is notable.

Natural resources of national and state importance exist in the study area as there are quite a few rare and listed species known to occur or that have the possibility of occurring because of habitat and proximity to known occurrences. Five species listed under the federal and/or state Endangered Species Acts, and 31 federal and/or state sensitive species have the potential to occur or do occur in the study area. The steep and rocky hill slopes, canyon walls, and stream terraces of the Molalla River support typical riparian and upland vegetation types characteristic of the West Cascades Ecoregion. The abundant patches of Scouler's corydalis are the most notable botanical point of interest in the riparian areas, which also provide visual interest especially in areas with wet cliff walls that have hanging bryophytes, ferns, and saxifrages. While much of the forest present on hillsides visible from the river has been logged in the past, some impressive late-seral forest is present and unique habitats include "rocky outcrops, cliffs, tallus slopes, wetlands, and riparian areas (Bureau of Land Management, 1993)."

It appears that the study area meets the criteria of possessing *outstanding* recreation values and that it is large enough to sustain the existing, substantial, levels of recreation use. The nature of the existing water-based uses and surrounding lands in the study segment indicates it meets the eligibility standards for recreation set in state statute. The importance of the river as important habitat for fish and wildlife should not be overlooked; the statute requires that both criteria be met.

## Program Goals

The scenic waterway program promotes cooperative protection and wise use of rivers in the system by all agencies (federal, state and local), individual property owners and recreation users.

Five general program goals include:

1. To protect the free-flowing character of designated rivers for fish, wildlife and recreation. No dams, reservoirs, impoundments and some forms of placer mining activities are currently allowed on scenic waterways.
2. To protect and enhance scenic, natural, recreation, scientific, fish and wildlife values along scenic waterways. New development or changes of existing uses proposed within a scenic waterway are reviewed before they may take place.
3. To protect private property rights. The Act discourages unsightly structures or inappropriate development that could be a nuisance to neighboring landowners and/or even depreciate property values. It prohibits pollution and the disturbance of adjacent surface lands by dredging. It also prohibits public use of private property without explicit consent of the landowner.
4. To promote expansion of the scenic waterway system. The Act sets up a process for adding new rivers to the system and establishes criteria for candidate rivers.

5. To encourage other local, state and federal agencies to act consistently with the goals of the program, the Oregon Parks and Recreation Department reviews plans and decisions made by other agencies to ensure consistency with the scenic waterways program.

### **Administration of the Oregon Scenic Waterways Program**

Scenic waterways are administered under the authority of the Oregon State Parks and Recreation Commission (ORS 390.805 to ORS 390.925). Administrative rules (OAR 736-40-005 to 736-40-040) have been adopted to govern the program. In addition to the general rules governing the program, specific rules are generated for management of each river segment in the system. These rules are created through the management planning process, and tailored to the actions necessary to maintain the existing character of the designated river corridor.

The Act and the Commission's rules require the evaluation of proposed land use changes within one-quarter mile from the ordinary high water line, on each side of the river, for their potential impacts on the existing special attributes of the river. Property owners wanting to build roads or houses; extract minerals and aggregate, harvest timber, or other similar projects, may need to provide written notification to the Oregon Parks and Recreation Department (OPRD). OPRD's evaluation of the project will be coordinated with other natural resource agencies (federal and state) having regulatory responsibility and with the local jurisdiction. OPRD relies on its river classification and administrative rules for each segment of the scenic waterway to determine whether the proposed project is inconsistent with the designated classification. OPRD works with the landowner to reach a resolution of conflicts. Where such resolution cannot be reached the Commission must decide within one year of the original notification whether to pay the property owner for the land or the development rights. If the Commission does not decide within one year to acquire the land or development rights, then the landowner may proceed in accordance with the original development proposal.

OPRD coordinates the program with local, state, and federal agencies to assure their actions are compatible with Scenic Waterway Act, administrative rules and resource management plans.

# Management of Scenic Waterways

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## **The Management Planning Process**

The goal of the scenic waterway management planning process is to develop a comprehensive and workable management plan which will protect or enhance the special attributes of the designated river corridor. Primary emphasis is the protection of aesthetic, scenic, fish and wildlife, scientific, and recreational features. The intent is to maintain the existing scenic condition of the area, without “turning back the clock” on existing land uses.

### ***Pilot: Advisory Groups and Draft Management Plan***

OPRD held two Advisory Group meetings (April 20, June 15) and one public workshop (July 20) for the waterway. The Advisory Group consists of local landowners, recreational users, local business owners, and local government members. These meetings provided the foundation for the final recommendations contained in the draft management plan.

The mechanisms for protection and enhancement to be included in this draft management plan are:

**Scenic Waterway Classification** - Within the management plan, scenic waterways are classified into one or more of six possible classifications, according to the character of the landscape and the amount and type of existing development.

**Administrative Rules** – If scenic waterway designation occurs, classifications are set in a management plan and specific guidelines for new development are established as state administrative rules through a public rule-making process.

**Other Management Recommendations** - Suggestions for actions to protect or enhance corridor values are also included in the management plan. Implementation could be through the OPRD, other state agencies, federal agencies or local agencies, organizations or persons. This includes input to OWRD’s recommendation of scenic flows to the Water Resources Commission.

Concurrently, the Oregon Water Resources Department (OWRD) staff began preparing a scenic flow recommendation to assist the Water Resources Commission in their consideration of designation of the proposed scenic waterways. Following designation (if that occurs), the Water Resources Commission will request that the Water Resources Department (WRD) identify flow quantities necessary for recreation, fish and wildlife uses before issuing water rights within or above designated Scenic Waterways (ORS 390.835(1)). WRD recommends Scenic Waterway flows to the Water Resources Commission through a formal staff report. The Commission then amends and/or approves the staff report and flow protections are implemented through the water right process for new water rights within and above the scenic waterway. Input from the OPRD Pilot Advisory Group and Public Comment regarding the recreational flow needs of the Scenic Waterway informs the recommendation that WRD puts forward to the Commission.

## Scenic Waterway Classification

Under Oregon law (ORS 390.345), the scenic waterway program is administered by the Oregon State Parks and Recreation Commission, and staffed by Oregon Parks and Recreation Department. OPRD works to protect scenic values, recreation and fish and wildlife, based on special attributes of each river. OPRD strives to protect special attributes of the river while recognizing existing land uses and management practices on adjacent lands.

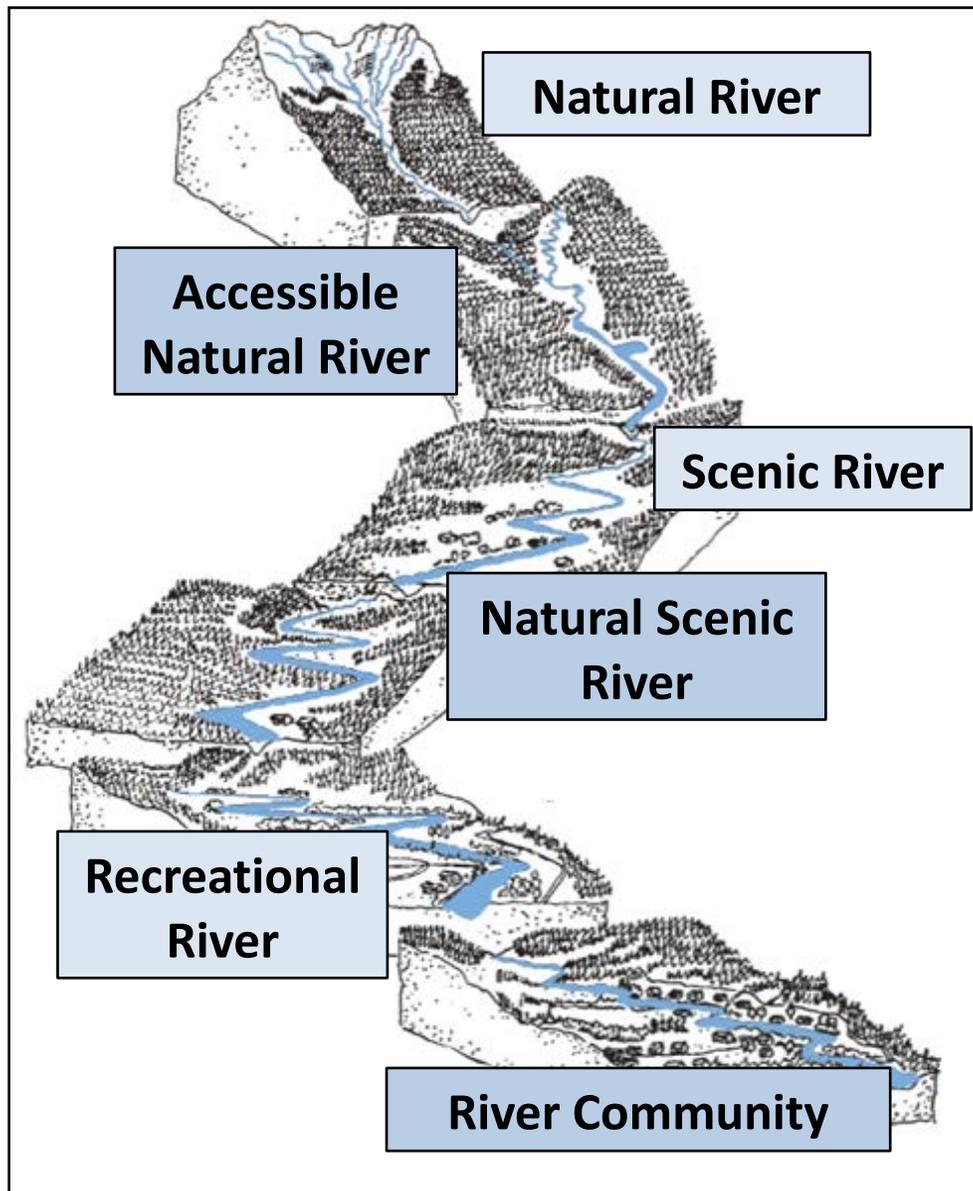


Figure 3. Diagram showing the six types of potential river classifications

In order to define and achieve management goals, the river is classified into one or more of six possible classifications according to the present level of land development, committed land uses, or landscape alterations. Once the classifications are set, appropriate guidelines for new development or landscape

alterations are established as rules. The major aim of the program is to maintain the existing scenic condition of the river.

The following are existing land use and land alteration conditions usually associated with each of the six river classifications; and how each kind of classification should be administered (managed) in the scenic waterways program:

**1. Natural River Areas** are generally inaccessible except by trail or river, with related adjacent lands and shorelines essentially primitive. These areas may include an occasional lightly traveled road, airstrip, habitation or other kind of improvement already established, provided the effects are limited to the immediate vicinity. These areas will be administered to preserve their natural, wild and primitive condition while allowing compatible recreational and other uses. Preservation and enhancement of the primitive character of these areas is the goal of this and the next two classifications.

**2. Accessible Natural River Areas** are relatively primitive, undeveloped areas with access by railroad or lightly traveled road but otherwise possess the qualities of a Natural or Scenic River Area. These areas are administered to protect or enhance their scenic character, while allowing compatible outdoor recreational use.

**3. Scenic River Areas** may be accessible in places by roads, but are largely undeveloped and primitive except for agriculture and grazing. Scenic River Areas may not include long stretches of conspicuous or well-traveled roads paralleling the river in close proximity, but may include extensive areas in agricultural use. River segments considered "Scenic" are managed to maintain or enhance their high scenic quality, recreation value, fisheries and wildlife habitat. The intent is to preserve their largely undeveloped character while allowing continued agricultural land use.

**4. Natural Scenic View Areas** are designated where one riverbank is inaccessible, undeveloped or primitive in character (possesses the qualities of a Natural or Scenic River Area) while the opposite bank and related lands are accessible and developed. These areas are administered, as appropriate, to preserve or enhance their essentially primitive scenic character, while allowing compatible public outdoor recreational use.

**5. Recreational River Areas** are readily accessible by road or railroad, with some agricultural, commercial and/or residential development along the banks; the river may have undergone some impoundment or diversion in the past. River segments considered "Recreation" are managed to allow continuance of a wide range of compatible river-oriented public outdoor recreation opportunities, to the extent that these do not substantially impair the natural beauty of the scenic waterway or diminish its aesthetic, fish and wildlife, scientific and recreational values.

**6. River Community Areas** are river segments where the density (residential tract or platted subdivision) of existing structures or other developments precludes application of a more restrictive classification. River segments considered "Community Areas" are managed to allow development that is compatible

with county zoning and blends into the natural character of the surrounding landscape. This also means protecting riparian vegetation, and encouraging activities that enhance the landscape.

Due to the individual character of each scenic waterway, administrative criteria within each of the six classifications may vary from one scenic waterway to another. Examples can be found in the [administrative rules for existing state scenic waterways](#).

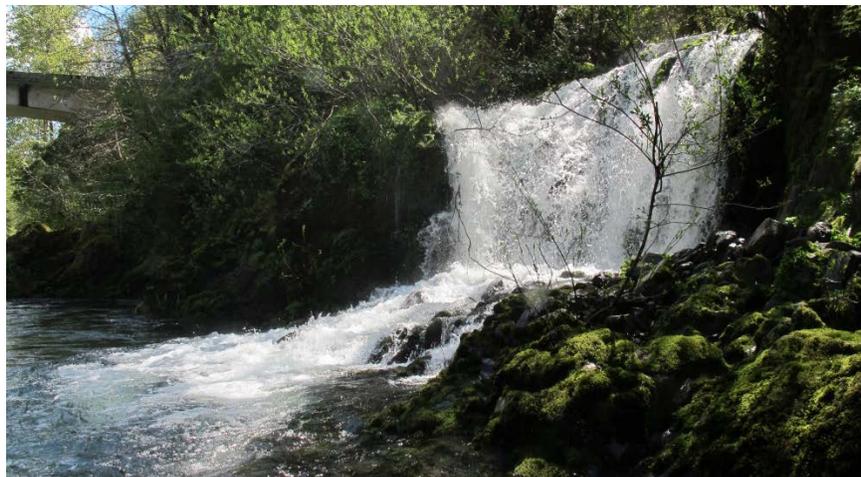
The rules established for each river classification generally allow some new construction and continued use of existing structures and improvements. Though some improvements require notification and approval, many others do not. For example, notification and approval is not generally needed for construction of new fences; maintenance of farm buildings, fences or outbuildings; laying of irrigation lines; crop rotation; removal of danger trees; construction of grain storage facilities under certain conditions; maintenance of existing residences and outbuildings; minor residential remodeling; construction of garage adjacent to existing homes; certain changes in landscaping; maintenance of roads and bridges; and firewood cutting for personal use. Mining, road building, construction of some new structures, placement of mobile homes, land clearing and timber harvest are examples of activities typically requiring approval. River classifications and the associated rules or guidelines determine how the natural and scenic beauty of the river will be maintained.

### **Scenic Waterway Land Management Program**

The Oregon Parks and Recreation Department, in collaboration with the Advisory Committee, proposes to apply three classifications to given segments of the proposed Molalla State Scenic Waterway. Classification locations and explanations for each river segment are provided below (see **Figure 4** for map):

#### ***Table Rock Fork Confluence to Pine Creek Confluence: Scenic River Area***

From the confluence with the Table Rock Fork to Pine Creek the river is proposed to be classified as a Scenic River Area. This section of river is accessible in a few places by roads and trails, but is largely undeveloped. The Table Rock Fork merges with what becomes the main-stem of the Molalla River at



**Horse Creek Falls and Bridge on the Upper Molalla River**

the beginning of this section, after which the river narrows (after approximately one mile) to form Horse Creek Canyon. In some sections, namely through a few narrow gorges, including Horse Creek Rapid, and an area of basalt canyon walls that surround the area known as the Molalla basalt rosette, or “eye of the Molalla”, where the river narrows as it crosses through rock outcrops with interesting rock formations.

The geology, hydrology (e.g., numerous small waterfalls), remote setting and water clarity combine to make this section of river outstandingly scenic. It is possible to obtain views *from* the river itself throughout this section by floating the river, when water levels allow. This segment is almost entirely in public (BLM) ownership with river access limited to a few undeveloped river access points, though hiking, kayaking, hunting, and primitive camping uses are evident. Turner Creek Bridge is the only trailhead along this road with parking and restrooms. River access is mostly undeveloped, with the exception of pedestrian trails down to the river. There are no designated paddling access points, however, the BLM has developed plans to construct a system of put-in and take-out locations to facilitate boating and improve safety. Potential sites for improvements (e.g, signing, pedestrian ramps for kayaks and rafts) include Turner Bridge. The BLM currently maintains two new seasonal campgrounds on the river banks (in the recreational section, see below) along with a planned campground near Pine Creek. BLM previously had dispersed campground along the corridor but are discontinuing that now that there are dedicated campgrounds.



Basalt rosette on the Molalla River

The area offers pleasing river-scape views with interesting and colorful vegetation, clear water in an area used seasonally by recreationists. The river is completely free-flowing within natural banks, with the exception of minor modifications made for the bridges and roads. The few developments that do exist are localized so their visibility does not detract noticeably from the general natural setting of the area. Horse Creek Bridge (shown above) and Turner Creek Bridge cross the river, and Pine Creek Bridge marks the end of this section. Other developments along the river include some visible impacts from

timber harvest and one residential home on private lands, although it is partially screened as viewed from the river and blends in with the scene.

The proposed management goal is to preserve the area’s high scenic quality, recreation value and fisheries and wildlife habitat by ensuring that all new developments blend into the natural character of the surrounding landscape while preserving the largely undeveloped character associated with existing uses.

### ***Pine Creek Confluence to Trout Creek: Recreational River Area***

From the Pine Creek Confluence to Trout Creek, the river is proposed to be classified as Recreational River Area. Roads follow the river in some parts; however, some of the river cannot be viewed from a vehicle or from the side of the road. Frequent trails allow pedestrian access to the river. The road (S. Molalla Forest Road) provides the primary access to the river south of the Glen Avon Bridge and runs adjacent to BLM property starting about 1.5 miles after the bridge. The only major day-use trailhead along this road with parking and restrooms is Hardy Creek Trailhead. Other trailheads include Amanda’s Trailhead, Americorp’s Trailhead, Sandquist’s Trailhead, and Annie’s Cabin Trailhead. Paddlers typically put in for the “3 Bears Run” near Turner Bridge (in the scenic section, above) or higher up on the river for a longer run. Some kayakers will also put in higher up on the river (above the study area), both on the Table Rock Fork, or, for the challenging Copper Creek rapids known as Lightning Lonnie (Class IV) and Dungeon, located near Dungeon Cr. (Keller, 1998).



**Rapids on the “3 Bears Run” of the upper Molalla River**

Most of the recreation focal points are minimally developed and at dispersed locations within the Molalla River Recreation Area, operated by the Salem BLM District. River access is mostly undeveloped, with the exception of pedestrian trails down to the river. There are no designated paddling access

points, however, the BLM has it in their plans to develop a system of put-in and take-out locations to facilitate boating and improve safety. The BLM maintains several new seasonal campgrounds on the river banks in the study area including Three Bears Recreation Site and Cedar Grove. BLM previously allowed dispersed campgrounds along the corridor, but are discontinuing that now that there are dedicated campgrounds.

Annually, thousands visit the Molalla River Recreation Corridor for year-round recreation including hiking, kayaking and white water rafting (and the use of other types of floatation devices in the low-water months), touring and mountain biking, camping, horseback riding, hunting, fishing, swimming, picnicking, nature watching, or to simply enjoy the sounds and sights of the river. There are more than 30 miles of non-motorized trails which access numerous waterfalls and vistas.

The Molalla is well known as a recreational river for visitors from the surrounding metropolitan areas, including Portland and Salem. However, it is also beloved by locals from Molalla and surrounding communities in Clackamas County for its swimming holes, scenery, camping, hiking, fishing and hunting. Facilities include restrooms, fire-rings, picnic tables, potable water, restrooms and river access. Cedar Grove, a group-camp operated by special recreation permit, is located at milepost 6 on the Molalla Forest Road. The area offers pleasing river-scape views with interesting and colorful vegetation, and clear water in an area used seasonally by relatively large numbers of recreationists. A summer recreation user study conducted for the BLM (White & Virden, 2007) found that a majority of survey respondents noted that viewing the scenic beauty is very important to them along with recreation in the corridor (White & Virden, 2007).

The river is completely free-flowing within natural banks, with the exception of minor modifications, mainly those made for the bridges and roads. The few developments that do exist are localized so their visibility does not detract noticeably from the general natural setting of the area. Glen Avon Bridge crosses the river below this section and in a few places the road and associated structures (e.g., riprap, retaining walls) are quite visible, albeit localized disturbances. Other developments along the river include visible impacts from timber harvest (mostly outside of the study area and buffer) and a few residential homes on private lands, although most of them are at least partially screened as viewed from the river (and are concentrated at end of the study area in the proposed river community area). The remote feeling of the area combined with views of forested slopes and interesting geologic features provides outstanding to generally pleasing views of the river and its surrounding scenery.

While there is more private property in this section than the upper section, most existing development is focused to the north of Trout Creek (in the river community area, see below). Public access is available in this segment because of multiple public access points on BLM property. Existing development includes a few residential homes, although most of the homes are not visible from the river due to topography and existing vegetation. Those that are visible are usually partially screened and blend into the environment (e.g., occur in natural tone).

The management goal in this section of river (as proposed) is to preserve and promote the area’s recreational quality by ensuring that any new developments blend into the natural character of the surrounding landscape and are compatible with existing county zoning.

***Trout Creek Confluence to Glen Avon Bridge: River Community Area***

From the Trout Creek Confluence to Glen Avon Bridge, the river is proposed to be classified as River Community Area.

There is significantly more private property in this section than the other two sections with most existing development occurring north of the Glen Avon Bridge (and not visible from the proposed designated section, which ends at the bridge). A large percentage of the private property ownership in this section is industrial timberlands. Existing development includes a few residential homes, although most of the homes (including the Molalla Retreat buildings) are not visible from the river *upstream* of the bridge (the designated section, *from which any potential impacts of future (new) development would be determined*) due to topography and existing vegetation. Those few that are visible above the bridge are partially screened and blend into the environment (e.g., occur in natural tones). There is a primitive paddling access on river left (east bank) near the bridge.

The management goal in this section of river is to allow development that is compatible with county zoning and blends into the natural character of the surrounding landscape. This also means protecting riparian vegetation, and encouraging activities that enhance the landscape.



**The Molalla River as seen from below the Glen Avon Bridge**

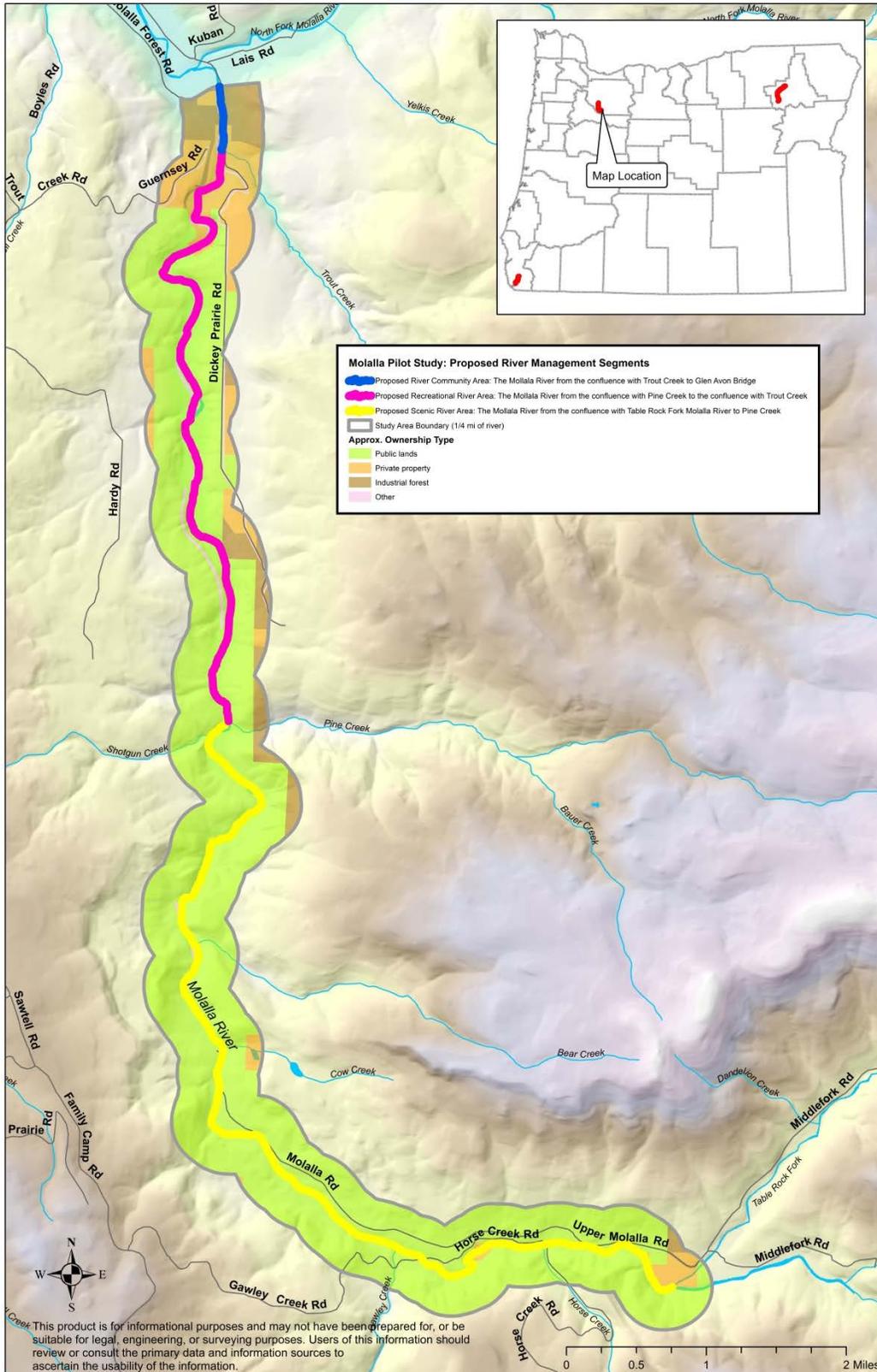


Figure 4. Draft proposed classification types and approximate land ownership

## Potential Land Management Rules

### For all scenic waterway areas

All new structures, improvements and development should be in compliance with the Public Use of Scenic Waterways Rules ([OAR 736-040-0025](#)) and Land Management Rules ([OAR 736-40-030 and 0035](#)) and be consistent with applicable BLM and Clackamas County land use and development regulations.

### Scenic River Area

*From the Confluence with the Table Rock Fork to Pine Creek*

#### Proposed draft rule guidance:

- Improvements needed for public recreation use or resource protection shall be designed to blend with the natural character of the landscape.
- Natural evergreen vegetation shall be maintained between new improvements and the river. The establishment of additional vegetative screening (preferably native vegetation) may be required to further mitigate the visual impact of new structure(s) as seen from the river if not blocked by topography.

Note: The BLM *manages* this section of river as “recreational” as it was found to be “suitable” for inclusion into the National Wild and Scenic River System “ in recognition of its outstanding recreational, scenic and geologic values” (Bureau of Land Management, 2010). Rivers found suitable are managed with interim protections until the river is released from consideration or designated under the National Wild and Scenic Rivers Act (Bureau of Land Management, 2010). This management guidance is generally consistent with designation as scenic river area under the State Scenic Waterway program. BLM currently has assigned the area into Visual Resource Management (VRM) Class II (Bureau of Land Management, 2010). The objective of Class II is to retain the existing character of the landscape, with only low level changes allowed to the landscape that do not attract the attention of the casual observer.

### Recreational River Area

*From the Pine Creek Confluence to Trout Creek*

#### Rule guidance:

- Improvements needed for public recreation use or resource protection may be visible from the river but shall be designed to blend with the natural character of the landscape as much as possible.
- New roads, mines and similar forms of development shall be set back from the river consistent with Clackamas County zoning and land development requirements and be screened from view from the river by topography or by existing or established evergreen vegetation.
- Existing natural evergreen vegetation will be maintained between new structures and the river, unless removal does not impact the view as seen from the river.

- The establishment of additional vegetative screening (preferably native vegetation) may be required to further mitigate the visual impact of the new structure(s) as seen from the river, if not otherwise blocked by topography or existing vegetation. The condition of “vegetation screening” shall consist of a density and mixture of native evergreen and deciduous vegetation to obscure or allow only a filtered view of the proposed structures or improvements.

Note: The BLM *manages* this section of river as “recreational” as it was found to be “suitable” for inclusion into the National Wild and Scenic River System “in recognition of its outstanding recreational, scenic and geologic values” (Bureau of Land Management, 2010). This management guidance is generally consistent with designation as recreational river area under the State Scenic Waterway program.

### *River Community Area*

*From the Confluence with Trout Creek to Glen Avon Bridge*

#### **Proposed draft rule guidance:**

- No land north of the Glen Avon Bridge and north of Dickey Prairie Rd west of the bridge affects the view from the waters within the proposed scenic waterway, therefore those areas are deemed to be “non-related adjacent land, and *are not included in the designation* and will **not be subject to scenic waterway review**.
- For areas north the bridge, existing federal, state and local (e.g., Clackamas County’s river protection plan) rules are sufficient.
- Future development and land management activities should be consistent with Clackamas County’s river protection plan.

Note: The BLM *manages* this section of river as “recreational” as it was found to be “suitable” for inclusion into the National Wild and Scenic River System “ in recognition of its outstanding recreational, scenic and geologic values” (Bureau of Land Management, 2010). Rivers found suitable are managed with interim protections (on federal lands) until the river is released from consideration or designated under the National Wild and Scenic Rivers Act (Bureau of Land Management, 2010). However, this section was not included in the various bills/proposed designation legislation. National Wild and Scenic designations apply primarily to federal lands, which is part of the reason for the establishment in many states of complementary state programs.

## **Potential Management Recommendations**

1. Collaborate with local partners and public agencies to develop and install small interpretive signs with messages about the river corridor (*potential topics* include: river stewardship, leave no trace, recreation, cultural resources, fisheries, wildlife, geology, water quality, hydrology, respecting private property) in key areas.
2. Collaborate with local partners and public agencies to develop a water trail recreation guide to facilitate river-based recreation opportunities, protect natural resources and private property. The guide may include maps and information showing property boundaries, river launch sites, day use areas, camping areas, other facilities, along with safety and other interpretive information.
3. Develop signs that identify public access for put in and take outs and/or developed recreation areas that are visible from the river and from the road access points.
4. Collaborate with local partners and land managers to explore funding to improve river access points (including boat ramps and access roads) to facilitate river recreational opportunities and improve visitor safety.
5. Develop organized regular river clean-up activities (e.g., trash and other debris) within the Scenic Waterway, particularly at river access points.
6. Explore opportunities to form partnership to exploring improvements in water quality, planting native species and invasive species management and/or monitoring efforts.
7. Use the Oregon Forest Practices Act to manage forest management activities on non-federal lands.
8. Follow BLM's Management Plan to manage federal lands. This includes application of applicable visual resource management categories to BLM lands (currently assigned to VRM Class II).
9. Explore excluding the segment studied and found eligible between Trout Creek and Glen Avon Bridge from designation (see suggested rule language).

For a summary of recommendations on flow levels necessary to protect the recreation, fish, and wildlife needs of the Molalla River, refer to Appendix A.

## Works Cited

- Bureau of Land Management. (1993). *Resource Assessment of the Molalla River*. Salem, Oregon: Salem District.
- Bureau of Land Management. (2010). *Molalla River-Table Rock Recreation Management Plan*. United States Department of Interior, Salem.
- Keller, R. (1998). *Paddling Oregon*. Helena: Falcon Publishing.
- Oregon Department of Transportation. (1987). *Recreational Values on Oregon Rivers*. Salem, Oregon: Oregon State Parks and Recreation Division.
- Palmer, T. (2014). *Field Guide to Oregon Rivers*. Corvallis: Oregon State University Press.
- Schuhmann, C. (2012). *Moon Oregon Fishing*. Berkeley: Avalon Travel.
- White, D. D., & Virden, R. J. (2007). *Molalla River Recreation Corridor and Table Rock Wilderness Visitor Survey*. School of Community Resources and Development. Phoenix: Arizona State University.

# Appendix A

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This is a placeholder for the Draft Water Resources Commission staff report on scenic waterway flow recommendations.

# Appendix B: Public Comment Summary

In April 2015, OPRD and Water Resources Department (WRD) held the first collaborative meeting with the advisory groups for each river. These groups, made up of local landowners, community leaders, recreation users and land managers, met again in late June 2015 to finalize the Draft Management Plan and Draft Scenic Waterway Flow Recommendation documents.

The resulting documents were presented in an open-house style public meeting on July 20 in Molalla which kicked-off a public comment period that ended on August 19. Approximately 16 members of the public attended the public meeting along with OPRD and WRD agency staff. The summary presented here (Tables 1-2) is for the comment period held in connection with the development of the draft management plan in coordination with local advisory committees. A separate public comment period was held in 2014. The results from the 2014 public comment period are included in the eligibility study report. Additional information, including the eligibility reports and meeting information is available online at <http://bit.ly/scenicwaterways>.

140 comments were received during the comment period (135 in support of designation and/or the management plan, and five in opposition). One comment (counted under designation/plan opposition) received did not state the person was actually opposed to the plan or designation; rather they questioned the scenic quality and eligibility of the waterway due to roadway stabilization features. The main concerns of two of the remaining four commenters were that the designation impacts the area below the Glen Avon Bridge. The land north of the Glen Avon Bridge and north of Dickey Prairie Road west of the bridge has been removed from the area under consideration for designation or future scenic waterway program review (see: [River Community Area](#) and Figure 4). That area has been removed from the study area map, and it is being recommended that it not be subject to future scenic waterway reviews or rules. The additional comments addressed concerns about private timberland (almost all of which is not likely visible from the river) and the potential impacts of designation as well as general concerns about increased visitation resulting in safety concerns and negative impacts to private property owners (e.g., trespassing) and river health.

**Table 1. Summary of public comments received during the proposed Molalla River Scenic Waterway draft management plan comment period (7/20/2105-8/19/2015)**

Written Comment Type	Oppose plan/designation	Support plan/designation
Individual emails and letters	5	21
Public meeting comment forms	0	2
Email form letters-both rivers	0	112
<b>Total written comments (2015)</b>	<b>5</b>	<b>135</b>

Public comments received during the proposed Molalla River Scenic Waterway comment period by location of residence are shown in the below table. The vast majority (91%) of those submitting comments in support of the Molalla River designation live in Oregon, 6% reside in California, and 3% in

other states. 44% of comments from Oregon were from the Portland Metro area, 32% from the Willamette Valley and 12% from Southern Oregon (Table 2). All of the (4) comments received in opposition to designation and/or the management plan were from the Molalla area.

**Table 2. Summary of public comments received by location of residence**

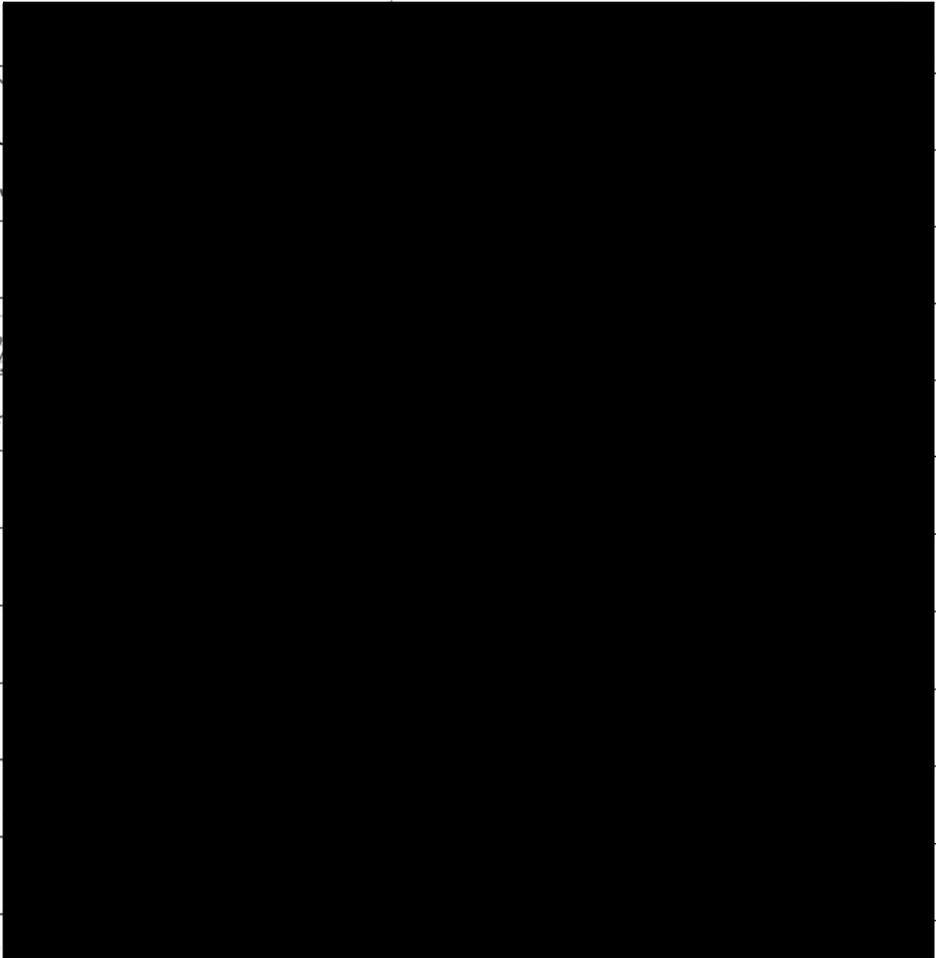
<b>State</b>	<b>Total (%)</b>
Oregon	91
California	6
Other	3
<b>Regions</b>	
Portland Metro	44
Willamette Valley	32
Southern Oregon	12
Central Oregon	8
The Coast	3
The Gorge	1



SIGN-IN SHEET  
SCENIC WATERWAY ~~ADVISORY COMMITTEE MEETING~~  
PUBLIC

DATE: July 20 2015

PLEASE PRINT CLEARLY

Name	Email Address (For future updates)
Jack Hammond (AC)	
Jan Nelson	
Sandy Kosik (AC)	
Jim Myron (AC)	
Christ Walsh	
Karen Graves	
Gary Potter (AC)	
Scott Marcella (A/C)	
Rainey Castleberry	
Corky Moore	
Mark Schmidt	
Kimberley Priestley	



**SIGN-IN SHEET**  
**SCENIC WATERWAY ADVISORY COMMITTEE MEETING**  
*Public*

DATE: July 20 2015

PLEASE PRINT CLEARLY

Name	Email Address (For future updates)
Tom + Bill Taylor	[REDACTED]
Bruce Steward	[REDACTED]



## PLEASE GIVE US YOUR COMMENTS

This comment card is provided for your convenience. Please write your comments on the card and hand it to OPRD staff before you leave; or mail comments to: OPRD Scenic Waterways Program, 725 Summer St. Suite C, Salem, OR 97301; or email comments to: [scenic.waterways@oregon.gov](mailto:scenic.waterways@oregon.gov). The comment period ends **August 19, 2015**, in this phase of the planning process. Additional public input opportunities will be available if the waterway is designated. For more information on the plan and the Oregon's State Scenic Waterway Program, please visit our website at: <http://bit.ly/scenicwaterways>.

I believe that adopting a protective section on the Molalla is needed and would benefit the community of Molalla.

The benefits of the existing Molalla Corridor can already be seen.

Thank you for all those people who work toward this end.

Rainey Castleberry

(Additional space on reverse side)

Molalla

## PLEASE GIVE US YOUR COMMENTS

This comment card is provided for your convenience. Please write your comments on the card and hand it to OPRD staff before you leave; or mail comments to: OPRD Scenic Waterways Program, 725 Summer St. Suite C, Salem, OR 97301; or email comments to: [scenic.waterways@oregon.gov](mailto:scenic.waterways@oregon.gov). The comment period ends **August 19, 2015**, in this phase of the planning process. Additional public input opportunities will be available if the waterway is designated. For more information on the plan and the Oregon's State Scenic Waterway Program, please visit our website at: <http://bit.ly/scenicwaterways>.

I THINK THE PLAN SHOULD BE  
ADOPTED. NOT ONLY DOES THE  
CITY OF MOLALLA DEPEND ON A  
CLEAN WATER SUPPLY, BUT MORE  
AND MORE IT IS BEING USED FOR  
RECREATIONAL PURPOSES: SWIMMING  
BOATING, CAMPING ETC. IT IS ONE OF  
THE MOST PRISTINE PLACES CLOSE TO  
PORTLAND AND SALEM. Henry Moore

(Additional space on reverse side)

 S. WRIGHT RD.

**AVISON LUMBER CO.**

PO BOX 419  
MOLALLA, OR 97038

503-829-9001 Office  
503-210-1200 Fax

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August 16, 2015

OPRD Scenic Waterways Program  
725 Summer St. Ste C  
Salem, OR. 97301

RE: Comments on Proposal for the Molalla River to be designated as a Scenic Waterway.

Avison Lumber Co. is an owner of Property within 1/4 mile of the Molalla River proposed Molalla River Pilot Study Area Boundary (as depicted on the attached map).

We are concerned that if our private property were to be included in the Scenic Designation that we would not be able to perform historic forestry activities at all or in a timely manner.

Those historic activities including fire suppression, harvesting, thinning, road maintenance, culvert repair and stand improvement need to be preserved.

Since it is apparent that our property is not visible from the Molalla River (immediately below our property, and a tall stand of BLM timber buffering any view), it is not clear why our Property needs to be included in the Scenic River designation which potentially would create another private property rights overlay.

Currently we operate any timber activities on the Property under the Oregon Forest Practice's Act - rules, which as you may be aware, are the strictest in the Country. We would recommend that you allow industrial timber property owners within a Scenic designation, to continue to operate under the ODF practices without additional rules that could cause delays and encumbrances affecting our ability to efficiently deal with any urgent forestry issue.

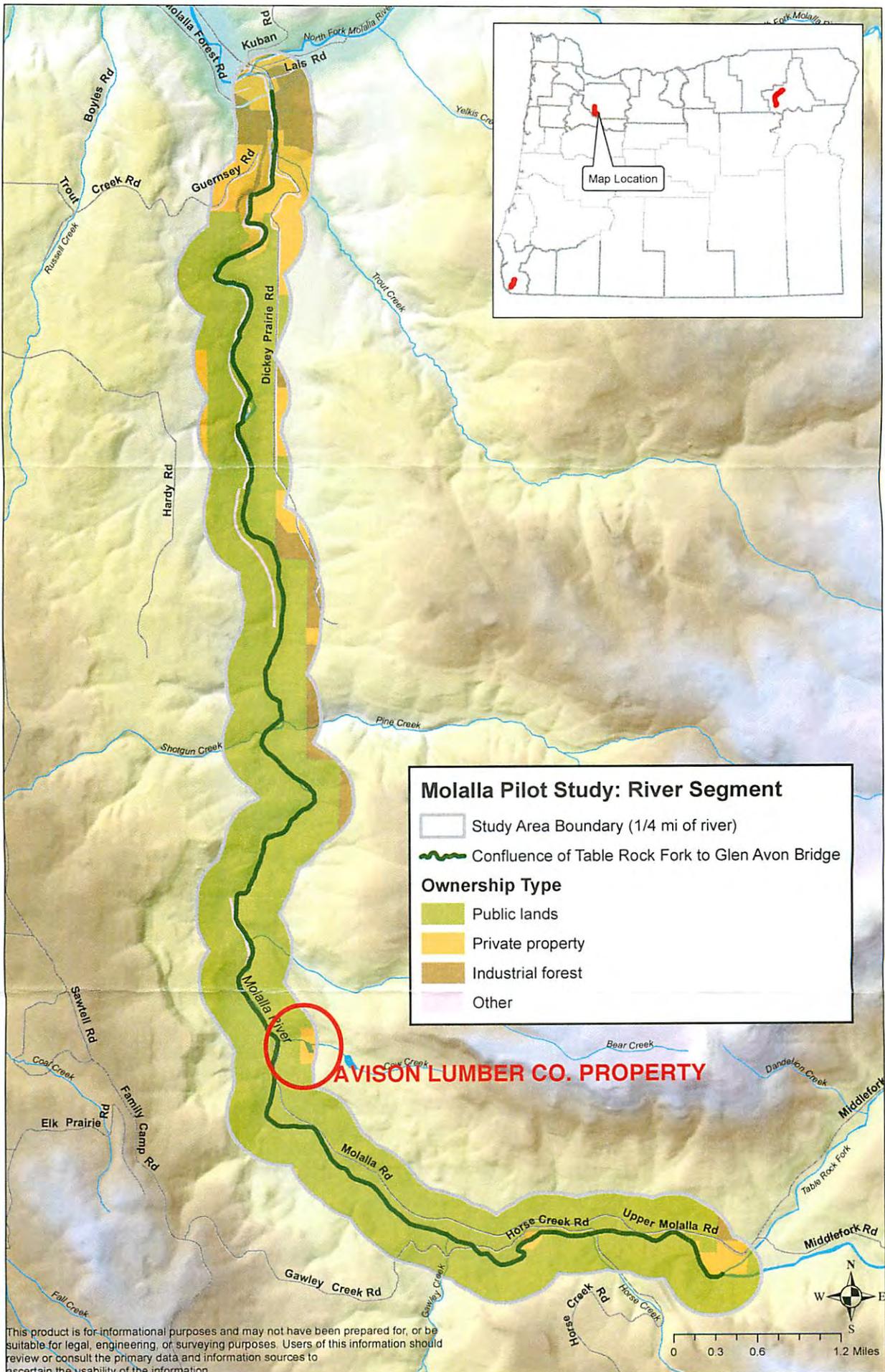
Please call us if you have any questions or require additional information.

Sincerely,

Avison Lumber Co.



William J. Avison  
President



This product is for informational purposes and may not have been prepared for, or be suitable for legal, engineering, or surveying purposes. Users of this information should review or consult the primary data and information sources to ascertain the usability of the information.

Will you be so bold as to attempt to control the flow of the Molalla? The Reach of the Trees? The blooms of the flowers? Where the wildlife lives?

**Please do not create a Molalla Scenic Waterway from Table Rock to the Glen Avon Bridge.**

Nature shares with man abundantly. The corridor is not a trophy. It is not for sale.

It is not meant to be domesticated with asphalt, concrete, heavy foot, bike and horse traffic.

It is meant to be shared. It is already being shared. The corridor is not yours to take.

It already belongs to the collective whole. Many parts privately owned are also already shared. It is not a commercial endeavor.

The Molalla Corridor is not developed for the masses. It can continue to belong to the people, the flora, the wildlife and the current property owners. Its enjoyment as it is can be continued without changes.

**Please do not create a Molalla Scenic Waterway from Table Rock to the Glen Avon Bridge.**

The impact and costs to the area would be significant and unsupported.

The only space available for the additional infrastructure needed for this kind of endeavor is people's existing yards, homes, hard earned purchases and ways of life. It will even negatively affect businesses already established.

These implied changes would be a benefit to a select and affluent few at an enormous cost to the whole and detriment to many as well as the area and its wildlife.

Beginning in this initial pursuit of action opens the possibilities of a larger plan which is even more

detrimental to area, residents, and nature. Everything costs in this society- we know this. Pretty brochures and marketing campaigns as well as ego induced pet projects help fuel more impact and more costs to all and the environment.

**Please do not create a Molalla Scenic Waterway from Table Rock to the Glen Avon Bridge.**

Please Step back and look at your motivations, ambitions and pride. Who does this taking benefit? Imagine if you will... your own current home... Imagine this coming to your neighborhood. Visualize the impact and then ask yourself: Do you like stepping out your front door onto a freeway? Do you like the idea that they may want to widen the road and remove your existence without payment or consideration? Do you want to increase crime in your neighborhood? Do you want to give your livelihood up? Do you want to be relocated against your will?

People make sacrifices and pay more daily to move to rural areas to get away from this chaos.

If you are purely looking to spend money, provide garbage service, provide more free campsites, eliminate the hardened criminals, increase rescue services. Reward those companies and private owners who already are sharing.

**Please do not create a Molalla Scenic Waterway from Table Rock to the Glen Avon Bridge.**

Doing so will increase pollution, crime, dangers to wildlife (and humans who come in contact with wildlife), increase traffic in an area where emergency response is limited (It is not the locals dying while recreating on the River...it is the out of town visitors), and this project will be an ongoing burden.

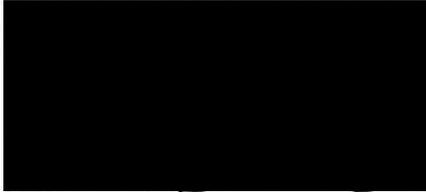
**Please do not create a Molalla Scenic Waterway from Table Rock to the Glen Avon Bridge.**

It will decrease recreation for locals who cannot afford to go elsewhere. It will cause a loss of property rights and homes and home values. It will remove established traditions, it will decrease recreational opportunities that are already in existence, it will decrease sale-ability with greater encumbering restrictions, it will decrease a way of life for current residents and it will decrease commerce by interfering with employment currently experienced in this area.

**Please do not create a Molalla Scenic Waterway from Table Rock to the Glen Avon Bridge.**

There is a lack of infrastructure to support the numbers of people you are inviting to a dead end road. This is not a thoroughfare.

**Please do not create a Molalla Scenic Waterway from Table Rock to the Glen Avon Bridge.**



Aimee Davis

Oregon Department of Parks and Recreation  
725 Summer St. Suite C  
Salem, OR 97301

August 11, 2015

RE: Letter in Support of Molalla Scenic Waterway Designation

Dear Oregon Department of Parks and Recreation:

Thanks you for the opportunity to offer my comments in support of scenic waterway designation for the upper Molalla River.

The Molalla is a pristine river offering unique geological formations, beautiful scenery and fabulous recreational opportunities. It is important to protect instream flows and habitat for salmon and steelhead.

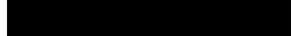
The Molalla River is an integral part of the cultural, historical and aesthetic values of the community of Molalla. Scenic waterway river status will enhance economic prospects for the greater Molalla community.

I encourage you to designate the upper Molalla River as a state scenic waterway.

Thank You,



Bill Taylor



Molalla, OR 97038

Oregon Department of Parks and Recreation  
725 Summer St. Suite C  
Salem, OR 97301

August 11, 2015

RE: Letter in Support of Molalla Scenic Waterway Designation

Dear Oregon Department of Parks and Recreation:

Thanks you for the opportunity to offer my comments in support of scenic waterway designation for the upper Molalla River.

The Molalla is a pristine river offering unique geological formations, beautiful scenery and fabulous recreational opportunities. It is important to protect instream flows and habitat for salmon and steelhead.

The Molalla River is an integral part of the cultural, historical and aesthetic values of the community of Molalla. Scenic waterway river status will enhance economic prospects for the greater Molalla community.

I encourage you to designate the upper Molalla River as a state scenic waterway.

Thank You,

  
Fran Taylor *(1)*

  
Molalla, OR 97038

August 1, 2015

Hello Park Planners,

I am encouraging you to include both the Molalla River and the Chetco River in the State Scenic Waterway Program.

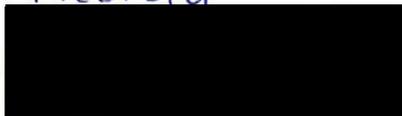
I have been paddling the Molalla River from the Table Rock Fork to the Glen Avon bridge (and also below Glen Avon) yearly for 35 years. I often paddle there five or more times each winter. (I sometimes visit the Molalla for a cool swim on a hot summer day, too.) The canyon section through the Three Bears rapids is exceedingly beautiful. To experience that beauty from river level is truly remarkable. The class III rapids are challenging and fun + mostly forgiving since the river is "pool drop" below Turner Bridge. Wildflowers are abundant in the springtime - I often see Calypso orchids at the "Old Bridge" put-in area.

I have yet to paddle the Chetco River in southern Oregon, but I have seen pictures of that beautiful river + read

reports of its stunning scenery and  
flora. I look forward to visiting  
that area someday soon.

Thank you for your efforts to  
include both the Molalla + the Chetco  
Rivers in the State Scenic Waterways  
program.

Sincerely



Laurie Pavay



Corvallis, OR 97333

**From:** [Molalla Retreat](#)  
**To:** [Waterways Scenic \\* OPRD](#)  
**Subject:** Molalla Scenic Waterways  
**Date:** Saturday, August 15, 2015 10:54:11 AM

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Scenic Waterways Staff,

As a resident of Glen Avon I feel that the inclusion of our neighborhood within the boundaries of the Scenic Waterways system is unnecessary and a bureaucratic certainty that is being forced on a group of unwilling citizens.

It became very clear early in the process of public involvement that the OPRD had set a boundary at the Glen Avon bridge and was unwilling to move the line no matter how much pushback they received. As an advisor to the process, I tried many times and in many ways to get the the Glen Avon subdivision out of the jurisdiction of this act but to no avail. The OPRD kept giving little snippets of ground and ultimately has offered us the carrot of a "Non-Related Adjacent Land" designation. Since none of us are lawyers, we are relying on the OPRD's word that this will keep us from having to deal with the regulation of this act, but none of us are really sure if that is the case. And certainly we are unsure what this designation will look like 20, 30, 50 years from now.

The Glen Avon neighborhood has endured regulation of the Timber (TBR) designation and the Clackamas County Principle River Conservation District for many years and now we are being forced to have another layer of bureaucratic regulation put on top of those. From a citizens view, it seems that our State and County government feels that duplicate regulation by every jurisdiction makes for a better Oregon, when in fact, in our opinion, it just shows how wasteful and overburdening our government is.

This subdivision was established by the Davies family (Ivor Davies) in 1931 and we have been good stewards of our properties for the last 80 years. An act that duplicates what the County government already has in place will not do one good thing for the river that is not already being done. All it really does is increase the power of the state government over it's citizens which sometimes appears to be the governments only aim.

Ultimately what we would like is for the OPRD to make the boundary stop at the Glen Avon Bridge and not continue it's 1/4 mile arc north of that point. It would be very easy to say that the bridge is a deadline but it does not seem to register with the state that deviation from a prescribed path is possible. This issue has been addressed repeatedly with the OPRD staff but getting beyond "this is just how we do it" mentality seems beyond a mere advisors ability.

Sincerely,

Bob Loucks

Resident Glen Avon and Advisor to the Scenic Waterway staff

**From:** [Rocky Stone](#)  
**To:** [Waterways Scenic \\* OPRD](#)  
**Subject:** Scenic Molalla River Waterway comment  
**Date:** Sunday, August 16, 2015 4:44:24 PM

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The Molalla River has four large wire basket retaining walls along its banks that I know of. Each one is hundreds of feet in length. How does this serve or meet the definition of a Natural Undisturbed Unaltered Oregon Scenic Waterway.

**From:** [Rae](#)  
**To:** [Waterways Scenic \\* OPRD](#)  
**Subject:** Molalla Scenic Waterway  
**Date:** Monday, August 17, 2015 9:01:38 AM

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Attention: Laurel Hillmann and Rocky Houston

I am writing as a Molalla River homeowner to express my thoughts about the plan to include my property in OPRD state scenic waterway.

I see no good reason for this inclusion, as it appears to be nothing more than a "land grab", for which the OPRD has offered nothing but; "it is to protect the river". Who are you protecting it from? The homeowners in my neighborhood annually have to pick up garbage that appears behind our homes after the spring run-off. This does not seem to come from downstream. It is thrown in the river by those use it as a recreation area.

In your correspondence, you list the north designation boundary is the Glan Avon bridge. In reality, it is one quarter mile north of the bridge which includes 20 plus private properties. It would be more appropriate to make the north boundary end at Trout Creek. By your rules, this would extend the "true" boundary one quarter mile, which would be very near the Glan Avon bridge.

By making that correction, you would be assured of our support in your effort to "protect" the waterways for future generations. Thank you for your consideration.

Jack Rae JR

[REDACTED]

Molalla, OR

**From:** [Rae](#)  
**To:** [HOUSTON Rocky \\* OPRD](#); [Waterways Scenic \\* OPRD](#)  
**Subject:** Molalla River - Potential Designation of State Scenic Waterway  
**Date:** Tuesday, July 14, 2015 4:37:29 PM

---

Dear Mr. Houston,

My wife and I recently were made aware that the OPRD was reviewing a plan to include our property as part of a state scenic waterway. We strongly disagree with this designation and the need for it. We are already managed by Clackamas County as to setbacks, building regulations, tree cutting, etc. To have the State Parks Division regulating the same thing is onerous to the property owners as well as a waste of tax payers money and time.

We also resent the fact that meetings and much discussion has gone on without making it clear that your proposal does not stop at the Glen Avon Bridge but, actually extends 1/4 mile north of it . This is all private property with no public access so why would you even consider putting it under OPRD regulation.

Certainly there must be other ways you can use your energy and tax payer resources than pressing for more regulations on the taxpaying residents in our neighborhood.

Most Sincerely,

Jack Rae

[REDACTED]  
Molalla, Or 97038  
[REDACTED]



P.O. Box 867 Molalla, Oregon 97038-0867 503-829-7858

riverwatch@molalla.net  
www.molallariverwatch.org

August 11, 2015

Oregon Department of Parks and Recreation  
725 Sumner St, Suite C  
Salem, OR 97301

RE: Molalla Scenic Waterway Designation

Dear Oregon Department of Parks and Recreation:

Molalla River Watch Watershed Council wholeheartedly supports Oregon Scenic Waterway designation for the upper Molalla River as outlined in the Draft Management Plan.

The Molalla River is an Oregon natural treasure located within a one hour drive of Portland and Salem. It is one of the few undammed rivers in the Pacific Northwest, home to the recovering and recently delisted Oregon chub, and provides drinking water for the cities of Canby and Molalla. The River is noted for its geological, historical and cultural values. It offers varied recreational opportunities including swimming, fishing, rafting and kayaking, horseback riding, camping, hiking, picnicking and bicycling. The proposed river segment begins at the lower end of the Table Rock Wilderness Area.

The Oregon DEQ lists the Molalla River as impaired due to low summer flows and high water temperatures. Preservation of instream flows and riparian habitat will help protect listed salmon and steelhead as well as other plants and wildlife.

We urge you to recommend the Molalla River as proposed in the Draft Management Plan for Oregon Scenic Waterway status.

Sincerely,

A black rectangular redaction box covering the signature of Bill Taylor.

Bill Taylor, Chair  
Molalla River Watch Watershed Council



# Oregon

Kate Brown, Governor

**Department of Fish and Wildlife**

Fish Division

4034 Fairview Industrial Drive SE

Salem, OR 97302

(503) 947-6201

FAX (503) 947-6202

[www.dfw.state.or.us/](http://www.dfw.state.or.us/)

August 19, 2015

OPRD Scenic Waterways Program  
725 Summer St. Ste C  
Salem, OR 97301



**RE: Comments on the Molalla River as a State Scenic Waterway**

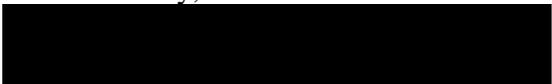
To whom it may concern:

The Oregon Department of Fish and Wildlife (ODFW) appreciates the opportunity to provide comments on the draft management plan and scenic flow recommendation for the potential designation of a portion of the Molalla River as a Scenic Waterway.

The Molalla River provides habitat for anadromous salmonids and resident trout, as well as many other native species of fish and wildlife. Instream water rights are currently established on the Molalla River to support the conservation, maintenance, and enhancement of aquatic and fish life, wildlife, fish and wildlife habitat, and any other ecological values. ODFW is pleased to see the instream flows proposed as the base of the scenic flows. In addition to meeting this instream flow regime, ODFW recommends scenic flows maintain the natural hydrograph of the system, including allowing the river to reach bank full and flood flows on a natural cycle. These flows provide conditions conducive to creating or maintaining stream morphology and habitat. In addition, land management under the designation should include strong protections for riparian habitats, which provide benefits to numerous species. The Oregon Parks and Recreation Department, in partnership with the Oregon Water Resources Department, should develop final scenic flows and riparian protection to protect all ecological needs of the river.

ODFW is hopeful that establishment of Scenic Waterways across Oregon can aide our mandate to protect and enhance populations of fish, wildlife, and their habitats for public use and enjoyment. If you have any questions, please contact me at 503-947-6092.

Sincerely,



Danette Faucera  
Water Policy Coordinator



August 19, 2015

Oregon Parks and Recreation Department  
Scenic Waterways Program  
725 Summer St., Ste C  
Salem, OR 97301

Re: Molalla River, proposed Scenic Waterway Designation and flow recommendations

Dear OPRD Scenic Waterway Program,

WaterWatch of Oregon supports the proposed designation of the Molalla River as State Scenic Waterway.

The citizens of Oregon passed the Scenic Waterway Act into law in 1970 by a two to one margin. The Act was adopted as a counter balance to existing policies that allowed the building of dams and diversion of water from beloved streams across the state. See ORS 390.815. With increasing development pressures on Oregon's beloved rivers across the state, this is an important tool to protect Oregon's most loved rivers into the future. Recognizing this, the Integrated Water Resources Strategy adopted by the Oregon Water Resources Commission in 2012 recommends designation of new state scenic waterways as one tool to meet instream water needs into the future.

Once a stream is designated, the Act requires the state to protect streamflows in quantities necessary to support fish, wildlife and recreation. Our comments today are focused on the "pilot" scenic waterway flow recommendation, found in Attachment A.

Scenic waterway approach: The Scenic Waterway Act mandates that the highest and best uses in Scenic Waterways are fish, wildlife and recreation. ORS 390.835(1). To that end, the state is required to protect flows in quantities necessary to protect these values. *Id.* Attachment A notes that the flow framework discussed with the advisory group combines scenic waterway management classifications with the median monthly natural streamflow defined by WARS. As an approach, WaterWatch has concerns with the proposed nexus of streamflow protection and management classifications. The scenic waterway management plans and classifications are directly tied to land use on adjacent lands. ORS 390.845(2). These plans are within the purview of the Oregon Department of Parks and Recreation. *Id.* at (1). River flow protections, on the other hand, are not tied to land management practices and/or river classifications, but rather are guided by the Act's mandate that the highest and best uses of waters within a scenic waterway are fish, wildlife and recreation. Moreover, streamflow protection mandated under the Act is under the purview of the Oregon Water Resources Commission. ORS 390.835, ORS 390.845(1).

To that end, the state should be protecting the maximum flows available under the Act regardless of the management classification of adjacent lands.

Recommended scenic waterway flows: The WRD is proposing between 85 to 100% of the median natural flow to be protected as scenic waterway flows, depending on the reach. At the very least, the WRD should be protecting 100% of the median natural flow in all reaches. That said, even at that, we do not believe this provides the full protection mandated by the Act. The Act is clear that the state must protect flows in the quantity necessary for fish, wildlife and recreation. ORS 390.835. The concern with using average median flows to meet this standard is that average median flows are not likely to capture the elevated biological triggering flows, channel maintenance flows and/or other streamflow functions associated with high flows needed to support healthy river and fish habitat. The 100% median flow should be the baseflow to build upon for the scenic waterway flow recommendation, not the ceiling. Thus, we urge the state to incorporate elevated flow levels necessary to support biological triggering and channel maintenance, among other things, into the recommended instream flows.

As a related matter, we appreciate that the WRD conditions new water right permits to protect scenic waterway flows and we support this conditioning, but again, unless the scenic waterway flows are protecting the full suite of flows necessary to maintain fish, wildlife and recreation uses then this conditioning does not protect against future development to the extent it should under the Act

And, as a final point, the Chetco advisory group recommended a “non numeric” recommendation that no new additional water rights should be allocated within or above the proposed scenic waterway. We did not see this recommendation associated with the Molalla. We urge the Water Resources Commission to adopt a similar protective measure for the Molalla.

In conclusion, WaterWatch strongly supports the proposed designation of the Molalla River as a new State Scenic Waterway. However, we urge the state to use the 100% of the median flow as the baseflow, not the ceiling, upon which to build additional recommendations to address elevated flows needed for important fish and river functions.

We thank the Oregon Department of Parks and Recreation and the Oregon Water Resources Department for their recent efforts to move forward in designating additional state scenic waterways and look forward to the continued attention to this program in years to come.

Sincerely,

A black rectangular redaction box covering the signature area.

Kimberley Priestley  
Sr. Policy Analyst



**THE LEAGUE OF WOMEN VOTERS  
OF CLACKAMAS COUNTY**  
PO BOX 411  
LAKE OSWEGO, OREGON 97034

August 8, 2015

Mr. Steve Kay  
Oregon Parks & Recreation Department  
725 Summer Street, Suite C  
Salem, OR 97301

Re: Scenic Waterways Public Comment

Dear Oregon Department of Parks and Recreation,

The Clackamas County League of Women Voters supports the designation of the Upper Molalla River from Table Rock Wilderness to Glen Haven Bridge near Molalla as an Oregon Scenic Waterway. The League believes that our waterways are a resource that should be managed for the benefit of the public and as sustainable habitat for all life forms.

This section of the Upper Molalla River should be given consideration as a waterway of critical environmental concern for several important reasons. First, it is the source of water for the cities of Molalla and Canby. It is an important resource for native fish and a variety of other wildlife. Also, it offers a wide range of recreational uses. Thus, we believe the river is a prime candidate for becoming a Scenic Waterway and should be given this designation.

The League applauds the interagency cooperation between Oregon Parks and Recreation, the State Parks Commission, and the Water Resources Commission that this recommendation represents. Thank you for this opportunity to offer our input on this issue.

Respectfully yours,

Marge Easley  
Action Chair, League of Women Voters of Clackamas County

**From:** [Joseph Blowers](#)  
**To:** [Waterways Scenic \\* OPRD](#)  
**Subject:** Please add Molalla as a Scenic Waterway  
**Date:** Friday, August 07, 2015 3:05:24 PM

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I'm writing to urge you to add the Molalla River as an Oregon State Scenic Waterway. I live on a farm less than two miles from the Molalla River. I use the area for bird watching as well as hiking and mountain biking.

The Molalla River is amazing in that it is one of the largest completely free-flowing rivers in the state and certainly among the largest in the Willamette Valley. As you probably know, the lower reaches harbored Oregon Chub at a time when that species was critically endangered. The upper reaches have runs of both salmon and steelhead. The reach you are considering is an amazing recreational gift to the community of Molalla, providing kayaking, fishing, hiking, mountain biking, horseback riding, wildlife watching and swimming to many, many people. It also provides the drinking water for the cities of Molalla and Canby.

I look forward to the additional recognition and protection that the Oregon State Scenic Waterway Program can provide for the Molalla River.

Joseph Blowers

[REDACTED]

Molalla, OR 97038

**From:** [Michael Cerbone](#)  
**To:** [Waterways Scenic \\* OPRD](#)  
**Subject:** Molalla River  
**Date:** Monday, August 03, 2015 10:16:15 AM

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Please accept this in support of the designation of the Molalla River as a State Scenic Waterway. I urge you to designate the entire length of the river. One of our favorite canoe floats in the state is from Aurora on the Pudding River, we float to the Molalla and then take that to the Willamette and pull out at Molalla River State Park. While the Three Bears is a great section (above Glen Avon), the two sections immediately below Glen Avon are also very scenic and worthy of the designation.

If you are looking for other rivers that are worth, I would suggest the Pudding River, it is great, very scenic and very relaxing.

Thanks,

**Michael Cerbone, AICP**

Community Development Director  
City of Cornelius  
(503) 357-3011  
[www.ci.cornelius.or.us](http://www.ci.cornelius.or.us)

**From:** [Jack and Sue Hammond](#)  
**To:** [HOUSTON Rocky \\* OPRD](#); [Waterways Scenic \\* OPRD](#)  
**Cc:** [John Atkins](#); ["Mark Schmidt"](#); [REDACTED]; ["Taylor"](#); ["Gary Potter"](#)  
**Subject:** RE: Teleconference information for upcoming Molalla scenic waterway advisory committee meeting  
**Date:** Friday, August 14, 2015 3:22:28 PM

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Greetings Rocky and Crew,

Unfortunately on August 24 I will be completely off the grid except by satellite phone which I don't have. Google "Nelson Lagoon- Aleutian Adventures" and you will see where. It My destination is the Steelhead River 40 miles from Nelson Lagoon, a small metropolitan city of 62 members the First Nation Aleut People. I will be accompanied by seven other fly fishing fanatics, 4 Aleut guides, 1 Bear Hunter [for protection] , 3 spey rods and 3 one handed fly rods of varying sizes.

I have appreciated very much the outstanding job you have done regarding the Proposal to designate the Upper Molalla River as an Oregon Scenic River, the first such designation since 1988. I am in full accord with that Proposal as well as the contents of the draft Management Plan including the new language concerning the nonapplicability of the Management Plan to residents north of the Avon Bridge.

Thanks and Wish me Tight Lines

Jack Hammond

**From:** [Kimberley Priestley](#)  
**To:** [Waterways Scenic \\* OPRD](#)  
**Cc:** [GOLDFARB Gabriela \\* GOV](#); [BYLER Thomas M](#); [HAVEL Chris \\* OPRD](#); [Busey Jen \\* OPRD](#)  
**Subject:** Joint Letter of Support for Designation of the Chetco and Molalla Rivers as State Scenic Waterways  
**Date:** Thursday, August 13, 2015 6:34:00 AM  
**Attachments:** [scenic waterway final aug 13 pdf.pdf](#)

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Dear Scenic Waterways Program,

On behalf of twenty six conservation groups, I am submitting the attached joint letter of support for the proposed designation of the Chetco and Molalla Rivers as state scenic waterways. Please include this letter in your documentation of comments for both the Chetco and Molalla River comment periods (Aug. 13th and Aug 19th, respectively).

We applaud the state for its work to designate new state scenic waterways, and to protect instream flows in the quantities necessary to support fish, wildlife and recreation in these beloved rivers.

If you have any questions, please feel free to contact me.

Best, Kimberley

--

Kimberley Priestley  
WaterWatch of Oregon  
213 SW Ash, Suite 208  
Portland, OR 97204  
ph: 503-295-4039, x 3  
[www.waterwatch.org](http://www.waterwatch.org)

**American Rivers---American Whitewater---Cascadia Wildlands---Center for Biological Diversity  
Columbia Riverkeeper---Hells Canyon Preservation Council---KS Wild---Native Fish Society  
Northwest Rafting Company---Oregon Coast Alliance---Oregon Council Trout Unlimited  
Oregon Environmental Council---Oregon League of Conservation Voters  
League of Women Voters of Oregon---Oregon Natural Desert Association---Oregon Wild  
Pacific Rivers Council---Rogue Riverkeeper---Smith River Alliance  
Soda Mountain Wilderness Society---The Freshwater Trust---Tualatin Riverkeepers  
WaterWatch of Oregon---Western Environmental Law Center---Willamette Riverkeeper  
Wild and Scenic Rivers---Wild Rivers Water Rights**

August 13, 2015

Oregon Parks and Recreation Department  
Scenic Waterways Program  
725 Summer St., Ste C  
Salem, OR 97301

Re: Support of proposed designation of the Chetco and Molalla Rivers as State Scenic Waterways

Dear Oregon Parks and Recreation Department Scenic Waterway Program:

We are writing to express our support of the proposed designation of the Chetco and Molalla Rivers as new state scenic waterways. The outstanding recreational, scenic and fish and wildlife habitat values provided by these rivers are very important to Oregonians and deserve protection.

The State Scenic Waterway Act, voted into law by Oregon citizens in 1970 by a two to one margin, exists to protect Oregon's most beloved wild and scenic rivers. This visionary Act directs that the highest and best uses of waters in state scenic waterways are fish, wildlife and recreation.

Both the Chetco and Molalla rivers are excellent candidates for designation under the state Scenic Waterway Act. The crystal clear waters of the Chetco River on Oregon's southern coast support a myriad of recreational opportunities, are the home to important populations of steelhead trout and salmon and provide exceptionally clean drinking water to downstream communities. People flock from all over the nation to recreate on this unique river. Similarly, the Molalla River in the foothills of the northern Oregon Cascades supports native winter steelhead and salmon runs, is resplendent with unique geological wonders and delivers a wide range of recreational activities including kayaking, rafting, swimming, camping and hiking.

To date, twenty of Oregon's most treasured rivers have been designated as state scenic waterways. The Act calls on the Oregon Parks and Recreation Department (OPRD) to undertake continuing study and submit periodic reports to the Governor, in concurrence with the Oregon Water Resources Commission (OWRC), recommending designations of additional rivers or segments of rivers. However, no new rivers have been studied or recommended for designation since 1988. In 2009 the Oregon Legislature passed HB 3369, which, among other things called on the state to develop an Integrated Water Resources Strategy to meet current and future water needs, including instream needs. After extensive public involvement, the OWRC adopted the Strategy in 2012, which, among other things recommends the designation of additional state scenic waterways. In 2013, Governor Kitzhaber directed OPRD to study

a minimum of three new rivers each biennium for recommendation to the Governor for future inclusion in the State Scenic Waterway Program.

We applaud OPRD for its recent work to study and recommend designation of the proposed reaches of Molalla and Chetco Rivers as new state scenic waterways and offer our full support of their designations.

In addition to our full support for state scenic waterway designation for both these rivers, we also urge the state to adopt the full suite of instream flows---including baseflows, biological triggering flows and channel maintenance flows---necessary to maintain the free flowing character of these rivers in the quantities necessary for recreation, fish and wildlife. Designating flows that protect these critical streamflow functions is necessary to provide the full protection required by the Scenic Waterway Act. Protecting these flows will not injure existing senior or downstream water right holders, but will ensure that river flows in the newly designated state scenic waterways are safeguarded against future development for generations to come.

The Chetco and Molalla Rivers provide incredible recreational, habitat and economic value to our state. On behalf of our tens of thousands of members throughout Oregon we support the designation of the proposed sections of the Chetco and Mollala Rivers as State Scenic Waterways, urge adoption of strong instream flow protections and look forward to the continued state attention to Oregon's most special rivers via the State Scenic Waterway program in the coming years.

Sincerely,

David Moryc, Senior Director River Protection Program  
American Rivers

Thomas O'Keefe, PNW Stewardship Director  
Megan Hooker, Associate Stewardship Director  
American Whitewater

Josh Laughlin, Interim Executive Director  
Cascadia Wildlands

Noah Greenwald, M.S., Endangered Species Director  
Center for Biological Diversity

Brett VandenHeuvel, Executive Director  
Columbia Riverkeeper

Darilyn Parry Brown, Executive Director  
Hells Canyon Preservation Council

Joseph Vaile, Executive Director  
KS Wild

Mark Sherwood, Southern District Manager  
Sunny Bourdon, Chetco River Steward  
Native Fish Society

Zachary Collier, Owner/Outfitter  
Northwest Rafting Company

Cameron LaFollette, Executive Director  
Oregon Coast Alliance

Tom Wolf, Executive Director  
Oregon Council Trout Unlimited

Teresa Huntsinger, Water Program Director  
Oregon Environmental Council

Christy Splitt, OLCV External Affairs Director  
Oregon League of Conservation Voters

Norman Turrill, President  
Oregon League of Women Voters of Oregon

Dan Morse, Executive Director  
Oregon Natural Desert Association

Steve Pedery, Conservation Director  
Oregon Wild

John Kober, Executive Director  
Pacific Rivers Council

Forrest English, Program Director  
Rogue Riverkeeper

Grant Werschull, Executive Director  
Smith River Alliance

Dave Willis, Chair  
Soda Mountain Wilderness Society

Rob Kirshner, Staff Attorney  
The Freshwater Trust

Brian Wegener, Riverkeeper Advocacy and Communication Manager  
Tualatin Riverkeepers

Kimberley Priestley, Senior Policy Analyst  
WaterWatch of Oregon

Susan Jane Brown, Staff Attorney  
Western Environmental Law Center

Travis Williams, Executive Director  
Willamette Riverkeeper

Alyssa Babin, Executive Director  
Wild and Scenic Rivers

Gordon Lyford, Agricultural Engineer  
Wild Rivers Water Rights

Cc:

Governor Kate Brown

Gabriella Goldfarb, Governor's Office Natural Resources Policy Advisor

Lisa Sumption, Director, Oregon Department of Parks and Recreation

Tom Byler, Director, Oregon Water Resources Department

Oregon Water Resources Commission

Oregon Parks and Recreation Commission



The Nature Conservancy in Oregon  
821 SE 14th Avenue  
Portland, OR 97214-2537

tel 503 802-8100

fax 503 802-8199

[nature.org/oregon](http://nature.org/oregon)

August 13, 2015

Oregon Parks and Recreation Department  
Scenic Waterways Program  
725 Summer St., Suite C  
Salem, OR 97301

RE: Support for Designation of the Chetco and Molalla Rivers as State Scenic Waterways

Dear Parks and Recreation Department,

The Nature Conservancy is pleased to support designation of the Chetco and Molalla Rivers as new State Scenic Waterways. Both of these rivers provide the outstanding scenic, natural and recreational values intended for recognition under the State Scenic Waterways Act.

The Molalla River is the longest free-flowing tributary of the Willamette River. It supports important populations of native fish and wildlife, including federally-threatened winter steelhead and spring Chinook. Both of these species are in significant decline in the Willamette Basin, and the unique run timing of these species in the Molalla River contributes to genetic diversity and species viability. The river also provides habitat for a number of federal species of concern, including the Oregon slender salamander. In addition, the river provides drinking water for the cities of Molalla and Canby, and numerous recreational opportunities including recreational fishing and boating.

The Chetco River, free-flowing from its headwaters in the Kalmiopsis Wilderness to its mouth at the Pacific Ocean, is a well-known gem on the Oregon Coast. At least 40 at-risk plant and animal species are in the area, including populations of federally-threatened coho, as well as important populations of winter steelhead and fall chinook salmon. The lower end of the river includes a rare Oregon example of the coast redwood association (coast redwood-tanoak/Pacific rhododendron forest), and the most northerly naturally occurring redwood stand in the world. The river provides exceptionally clean drinking water to the residents of Brookings-Harbor, and tremendous diversity of recreational uses throughout the year.

We applaud Oregon Parks and Recreation's work studying and evaluating the Molalla and Chetco Rivers and the quality of the reports produced by the Assessment Team. The information clearly supports designation of these two rivers as State Scenic Waterways.

Sincerely,



Catherine Macdonald  
Director of Conservation Programs

**From:** [Daniel Davis](#)  
**To:** [Waterways Scenic \\* OPRD](#)  
**Subject:** Feedback on draft management plan for Molalla and Chetco river  
**Date:** Monday, August 17, 2015 12:46:19 PM

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I wanted to write a short note as feedback to the proposed management plan for the Molalla and Chetco rivers.

First the Molalla: This is a beautiful waterway that is close to Portland, with many great camping opportunities in addition to the whitewater. My biggest concern with this waterway is really related to what has happened to the Clackamas corridor over the past few years; given its proximity to Portland, it can become overrun with summer weekenders with little regard for the pristine state of the watershed. This is currently a must lesser-known alternative to the Clackamas, but I do not expect that it will stay that way. Enforcement of existing regulations must not be lax, and management should consider requirements of parking passes and other overnight permits to discourage mis-use.

And then the Chetco: This wilderness is not at risk of being overrun as it is very difficult even for the most dedicated kayakers to access. And I think it should stay difficult to access, as this is one of the last pure and wild watersheds in the area.

Thanks again for your consideration and for the opportunity to comment!  
Daniel Davis

**From:** [Tom Berridge](#)  
**To:** [Waterways Scenic \\* OPRD](#)  
**Subject:** Please Designate the Molalla & Chetco River Segments as State Scenic Waterways  
**Date:** Tuesday, August 11, 2015 9:28:02 AM

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Dear Oregon Department of Parks and Recreation,

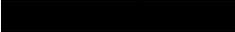
As a kayaker, rafter, and general river enthusiast, I want to urge you to add the Molalla and Chetco river segments to Oregon's network of Scenic Waterways. I have kayaked the Molalla River, which is a very special place that should be preserved in its natural state. I have not had the opportunity to visit the Chetco River, but when I am able to do so, I hope to find it in its natural condition, whether I get there this year or in 10 years.

Both of these watersheds are valuable assets to local communities and deserve to be protected foremost for their outstanding aesthetic, recreational, and ecological benefits.

Moreover, I am writing to ask that the state adopt instream flow protections necessary to maintain the free-flowing character of these river segments in the full quantities necessary for recreation, fish, and wildlife – including baseflows, biological triggering flows, and channel maintenance flows. One of the most important benefits for fish populations in the Chetco and Molalla State Scenic Waterways proposals are instream water allocations for scenic flows.

I greatly appreciate the opportunity to comment in support of the designation of the Molalla and Chetco rivers as state scenic waterways and the setting of the maximum instream flows necessary to protect these Oregon gems.

Regards,  
Tom Berridge

Tom Berridge  
  
Lake Oswego, OR 97035

**From:** [Jeff Cruze](#)  
**To:** [Waterways Scenic \\* OPRD](#)  
**Subject:** Molalla & Chetco Rivers  
**Date:** Monday, August 10, 2015 2:30:29 PM

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Dear Oregon Department of Parks and Recreation,

I'm writing to lend my support for the Molalla and Chetco river segments as additions to Oregon's network of Scenic Waterways. Both of these watersheds are valuable assets to local communities and deserve to be protected foremost for their outstanding aesthetic, recreational, and ecological benefits.

Moreover, I am writing to ask that the state adopt instream flow protections necessary to maintain the free-flowing character of these river segments in the full quantities necessary for recreation, fish, and wildlife – including baseflows, biological triggering flows, and channel maintenance flows. One of the most important benefits for fish populations in the Chetco and Molalla State Scenic Waterways proposals are instream water allocations for scenic flows.

I greatly appreciate the opportunity to comment in support of the designation of the Molalla and Chetco rivers as state scenic waterways and the setting of the maximum instream flows necessary to protect these Oregon gems. I fish both of these streams and appreciate the wild, scenic treasures they are.

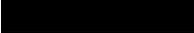
Regards,

Jeff Cruze

**From:** [Tommy Swearingen](#)  
**To:** [Waterways Scenic \\* OPRD](#)  
**Subject:** Mollala/Chetco Proposal  
**Date:** Saturday, August 01, 2015 8:09:56 AM

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I want to register my support for State Scenic Waterway designation for these two rivers. They are excellent whitewater runs and deserving of any degree of state recognition and protection. Many paddlers consider the Mollala one of the premier runs in the state.

Tommy Swearingen, PhD  


**From:** [Kevin Hill](#)  
**To:** [Waterways Scenic \\* OPRD](#)  
**Cc:** [Hill, Allison](#)  
**Subject:** Molalla & Chetco - State Scenic Waterways  
**Date:** Thursday, July 30, 2015 6:40:49 PM

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Hello,

I am writing to express my strongest support for designating the Molalla and Chetco rivers as State Scenic Waterways. My wife and I moved to Oregon from Wisconsin about one year ago, and the **main** thing that brought us here was whitewater kayaking and the many beautiful rivers in this state. We live in Silverton, and we love the Molalla and many other surrounding rivers. While I have yet to paddle on the Chetco, I know it by reputation, and have seen the amazing pictures. It is on my short list!

Please do everything you can to see that these state treasures remain in as pristine, free-flowing, and available a state as possible for all of us to enjoy for generations to come.

Sincerely,  
Kevin Hill



Silverton, OR 97381

**From:** [REDACTED] on behalf of [Susan Elliott](#)  
**To:** [Waterways Scenic \\* ORPD](#)  
**Subject:** Comment on the State Scenic Waterways Designation - Molalla and Chetco  
**Date:** Thursday, July 30, 2015 11:13:33 AM

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ORPD,

It brings me great joy that the Molalla and Chetco rivers are being considered for designation in the State Scenic Waterways Designation program. These two rivers are pure gems in the paddlesports communities and absolutely deserve to be preserved for this value. I believe it is incredibly important to designate waterways as special, beautiful, and necessary in their natural form if our society is to continue to develop and grow. If we do not set aside waterways, we will never learn to value them. Even more so, our children will never know how valuable they are in their natural state.

These two rivers are highly prized by the recreation community in the Northwest. They both are prized for their water quality, their remote nature, and their inviting rapids.

Thank you for protecting these rivers.

Cheers,  
Susan Elliott

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**Susan Hollingsworth Elliott**  
Graduate Student, Water Resource Engineering Program  
Oregon State University

[REDACTED]  
[REDACTED]

**From:** [Pierre Caritey](#)  
**To:** [Waterways Scenic \\* OPRD](#)  
**Subject:** Chetco and Molalla  
**Date:** Wednesday, July 29, 2015 10:03:46 PM

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I am very happy that you are thinking of placing the Molalla and the Chetco in the Oregon scenic waterways category. I live by the Chetco River and have paddled or hiked a good part of it. I really hope it will stay pristine .  
You have my complete support  
Pierre Caritey

Sent from my iPad

**From:** [Nathan Pulliam](#)  
**To:** [Waterways Scenic \\* OPRD](#)  
**Subject:** Molalla and Chetco Rivers- Scenic Waterways Program  
**Date:** Tuesday, July 28, 2015 3:02:24 PM

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Dear OPRD Scenic Waterways Program,

I am emailing you today to let you know that I am in full support of the plans to designate the Molalla and Chetco rivers as State Scenic Waterways. Both of these rivers are very important to myself and many others. It is great to know that these rivers will be conserved for many generations to come and that those generations of people will have the same opportunity to recreationally paddle these rivers.

Thanks for your time and work regarding these two rivers!

Sincerely,

Nate Pulliam

Kayak and Canoe instructor at Alder Creek Kayak and Canoe in Portland Oregon

**From:** [Jacob cruser](#)  
**To:** [Waterways Scenic \\* OPRD](#)  
**Subject:** Chetco and Molalla  
**Date:** Tuesday, July 28, 2015 12:27:40 PM

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Both the Molalla and Chetco rivers are gems of Oregon. The Molalla is special because it captures Oregon's beauty in a location easily accessible to the public. The Chetco is special because it is a premium wilderness that captures the essence of Oregon. In a country where many of the wild places have been tamed, the Chetco stands wild and rugged.

Two incredible drainages, each appealing to a different sect of Oregon's population.

-jacob

**RE: Please Designate the Molalla & Chetco River Segments as State Scenic Waterways**

Dear Oregon Department of Parks and Recreation,

I'm writing to lend my support for the Molalla and Chetco river segments as additions to Oregon's network of Scenic Waterways. Both of these watersheds are valuable assets to local communities and deserve to be protected foremost for their outstanding aesthetic, recreational, and ecological benefits.

Moreover, I am writing to ask that the state adopt instream flow protections necessary to maintain the free-flowing character of these river segments in the full quantities necessary for recreation, fish, and wildlife – including baseflows, biological triggering flows, and channel maintenance flows. One of the most important benefits for fish populations in the Chetco and Molalla State Scenic Waterways proposals are instream water allocations for scenic flows.

I greatly appreciate the opportunity to comment in support of the designation of the Molalla and Chetco rivers as state scenic waterways and the setting of the maximum instream flows necessary to protect these Oregon gems. The Molalla and Chetco are truly among Oregon's finest watersheds and their inclusion into Oregon's network of Scenic Waterways would be a fitting way to reinvigorate a valuable state program.

Regards,

Randall Hughes	Alameda, CA
Dave Van Domelen	Amity, OR
Jim McCarthy	Ashland, OR
Mort Smith	Ashland, OR
Ken Morrish	Ashland, OR
Bob & Karen Robinson	Ashland, OR
Robyn Janssen	Ashland, OR
Yancy Lind	Bend, OR
George Wuerthner	Bend, OR
Jim Myron	Canby, OR
Fred Pendergast	Cupertino, CA
Nancy Nichols	Deadwood, OR
Kathy Giesen	Eugene, OR
Jen Matthews	Eugene, OR
Glen and Rhoda Love	Eugene, OR
Bob Bumstead	Eugene, OR
Kay and Daniel Robinhold	Eugene, OR
John Brinkley	Eugene, OR
Ken MacDonald	Gresham, OR
Thomas Blacklidge	Lake Oswego, OR
Jeff Evershed	Lake Oswego, OR
Dale Madden	Maupin, OR
John Forsyth	Medford, OR
Tom Derry	Molalla, OR
Larry and Jo Ellen Turigliatto	Napa, CA
Tracy Buckner	Oregon City

Steve & Randi Kobak	Portland, OR
Matt Deniston	Portland, OR
Laurie Todd	Portland, OR
Genevieve Long	Portland, OR
Edith Gillis	Portland, OR
Kris N	Portland, OR
Stan Chesshir	Portland, OR
John Warren	Portland, OR
Jacob Reiss	Portland, OR
Robert Bernstein	Portland, OR
Courtney Wilson	Portland, OR
Nick Rowell	Portland, OR
Amy Simpson	Portland, OR
Sarah Deumling	Rickreall, OR
Borst Engineering & Construction Borst	Rogue River, OR
Russ & Delana Beaton	Salem, OR
Lee & Marilyn Rengert	Salem, OR
Corinne Sherton	Salem, OR
Ayani Mikasi	Talent, OR
Mr. Peter Ware	Talent, OR
Ken Anderson	Vancouver, WA
Barrett Edgar	Wedderburn, OR
Phillip Mamula	West Linn, OR
Richard Hafele	Wilsonville, OR
Jim Ruff	Wilsonville, OR

**RE: I Support Designating the Molalla & Chetco Rivers as State Scenic Waterways**

Dear Oregon Department of Parks and Recreation,

I'd like to offer my support for the Molalla and Chetco rivers as additions to Oregon's network of Scenic Waterways. Both of these wild, free flowing watersheds are valuable assets to local communities and deserve to be valued foremost for their outstanding aesthetic, recreational, and ecological benefits.

I appreciate that both the Molalla and Chetco draft State Scenic Waterway management plans have been developed with input from local stakeholders including River Stewards and staff from Native Fish Society, who provided suggestions based on their on-the-ground knowledge of these rivers and their natural values.

I support the recommendations these stakeholder groups have made with regard to both the Molalla and Chetco river segment classifications and the resulting "potential land management rules." These rules strike a balance between maintaining the scenic and ecological integrity of the river corridors and the rights of adjacent private property owners. Maintaining the natural condition of the river corridor will also benefit the wild, native fish by protecting water quality and maintaining free flowing characteristics.

I support the "potential management recommendations" found in both the Molalla and Chetco draft management plans. Both communities indicate the need for additional support and partnership with the OPRD to assist with local cleanups, maintenance and improvements to access and bathroom facilities, additional interpretive signage and partnerships to attract future habitat restoration investments.

One of the most important benefits for wild, native fish in the Chetco and Molalla State Scenic Waterways proposals are instream water allocations for scenic flows. Fish benefit from safeguards to the natural hydrological fluctuations of a wild river; which moves sediment, redistributes and collects large woody debris and reclaims side channel habitats critical for rearing salmonids. For these reasons I support allocating 100% of the available flows as part of the scenic flow allocations for both the Molalla and Chetco.

I greatly appreciate the opportunity to comment in support of the OPRD's draft State Scenic Waterway management plans. The Molalla and Chetco are truly among Oregon's finest watersheds and their inclusion into Oregon's network of Scenic Waterways would be a fitting way to reinvigorate a valuable state program.

Regards,

Charles Gehr	Ashland, OR
William Morrish	Ashland, OR
Aaron Bento	Beaverton, OR
Steven S. Lent	Beaverton, OR
Dennis Miller	Bend, OR
Ron Thompson	Bend, OR
Peter Murray	Bend, OR
Troy Leedy	Bend, OR
Caryn Graves	Berkeley, CA

Mark Sherwood	Brookings, OR
Richard Kelllogg	Camp Sherman, OR
John Larison	Corvallis, OR
Shawn Donnille	Eugene, OR
Doug Heiken	Eugene, OR
Brent Ross	Eugene, OR
Christopher I Hiatt	Eugene, OR
Josh Lusher	Eugene, OR
Lawrence P. Leine	Glide, OR
Dennis Biggins	Hillsboro, OR
Forrest Jones	Hood River, OR
Melissa van scoyoc	Klamath Falls, OR
Douglas Robertson	Lake Oswego, OR
Robert C. Watzke	Lake Oswego, OR
Greg Hogensen	Lake Oswego, OR
Brian Silvey	Maupin, OR
Eric Ellingson	McMinnville, OR
David A Wang DDS	Medford, OR
Erin Mahanay	Medford, OR
NA	Mount Shasta, CA
Dale Greenley	Myrtle Creek, OR
David Charles Quinn	Ocean Shores, WA
Russell Loeb	Oregon City, OR
James Baggett	Oregon City, OR
Bill Percy	Philomath, OR
Tim Knecht	Portland, OR
Michael Jolliffe	Portland, OR
Jake Crawford	Portland, OR
Henry Carlile	Portland, OR
Brian Emerick	Portland, OR
River Steenson	Portland, OR
Charles Carroll	Portland, OR
Nathan Hall	Portland, OR
Jon Kellogg	Portland, OR
Tyler Allen	Portland, OR
Edward L. Marxer	Portland, OR
Danny McGinley	Portland, OR
Cliff Canepa	Portland, OR
Dan Ellis	Portland, OR
Kenneth Bierly	Salem, OR
Matt Neznanski	Salem, OR
Charles Hammerstad	San Jose, CA
Jeff Perin	Sisters, OR
Edward Filice	Sonoma, CA
Shawn Scriven	Springfield, OR
Rob Perkin	Tigard, OR
Jessica Ahlstrom	Tucson, AZ
Douglas Rohn	Tucson, AZ

Brad Staples  
Andrew Miller  
Don Titterington  
Jeremy Quinlan

West Linn, OR  
West Linn, OR  
Wilsonville, OR  
Woodland Hills, CA