

**From:** [Garner, Kim](#)  
**To:** [Fiedler, Chuti -FS](#); [FS-comments-pacificnorthwest-mthood](#)  
**Subject:** FWS comments on River Values Report  
**Date:** Monday, November 5, 2018 12:00:41 PM  
**Attachments:** [River Values Report FWS Comments 11-2-18.pdf](#)

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Please find our comments on the Mt Hood NF River Values Report attached.

Thanks,  
Kim

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# United States Department of the Interior



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Richard Periman  
Forest Supervisor, Mt. Hood National Forest  
16400 Champion Way  
Sandy, OR 97055  
Attn: Michelle Lombardo

Dear Mr. Periman,

Thank you for the opportunity to review and provide comments on the River Values Report. In general, we found the report to be well written and the summaries of the important features of each stream/river segment to be quite comprehensive, accurate, and up to date. Our specific comments are below. One general comment is there was no mention of freshwater mussels, a species that is under increasing attention in the Pacific Northwest. A species distribution database is available from the Xerces Society, which could potentially have information on mussel species and where they have been found in the Hood River basin. The database can be requested from the Xerces Society at <https://pnwmussels.org/collecting-surveying/> (see "western freshwater mussel database").

### Specific comments:

On p. 21 of the report (Collawash sxn) there is a paragraph on non-native species which states "non-native brook trout pose a future threat to rainbow and cutthroat trout through predation and competition if they expand their current distribution in the Collawash River." Bull trout should also be included on the list of native species that may be impacted by brook trout. The threat would be predation and competition (as above) but also hybridization. There is a similar statement at the top of p. 53 for the Fish Creek (Clackamas) section, and p. 68 (S. Fk. Clackamas) where bull trout should be mentioned as potentially negatively affected by brook trout.

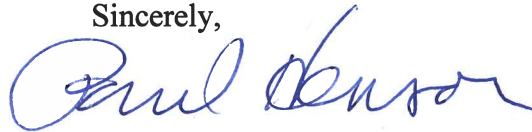
On p. 60 (Fisheries - Middle Fork Hood River) there are statements that there are two bull trout "core populations", one above Clear Branch Dam and one below. First, the report should utilize the term "core area" instead of "core population". Second, the interagency Hood River Bull Trout Working Group has determined in recent years that there is only one bull trout core area in the Hood River Basin and that is the core area upstream of Clear Branch Dam. It has been determined that most, if not all, bull trout observed downstream of Clear Branch Dam, and on down to the Columbia River, are fish that migrated or were entrained through Clear Branch Dam

(i.e., originating from the bull trout population that inhabits Laurence Lake, Clear Branch, and Pinnacle Creek, all above Clear Branch Dam.

The 3rd paragraph on p. 60 (Middle Fk. Hood River) also mischaracterizes the ability of the core area population above Clear Branch Dam as having the ability to "naturally migrate" to and from the Columbia River. In reality, there are no current passage facilities in operation at Clear Branch Dam to safely move fish downstream or upstream over the facility. Although it is believed that there are some bull trout that are moving downstream past the dam via seasonal spill events, there are currently no efforts to capture those fish that survive and attempt to return to natal habitat upstream of Clear Branch Dam. This inaccuracy in the report should be resolved. It is worth noting that the Middle Fork Irrigation District is planning to install fish passage facilities in the future. Once those facilities are in place, and more bull trout expand and utilize river segments below Clear Branch Dam, the habitat in the wild & scenic section of the Middle Fork Hood River will become key habitat for the recovery of bull trout in this river basin.

We appreciate the opportunity to provide input into your planning efforts. If you have any questions, please contact Kim Garner at (503) 231-6962.

Sincerely,



Paul Henson  
State Supervisor