

From: [Doug Heiken](#)
To: [FS-comments-pacificnorthwest-mthood](#); [O'Connor Card, Jennie -FS](#)
Subject: Mt. Hood Wild and Scenic Rivers Planning — comments on the River Values Report
Date: Thursday, November 1, 2018 3:20:17 PM
Attachments: [Mt Hood WSR planning scoping, 11-1-2018, Mt Hood NF.docx](#)

Please find attached Oregon Wild's comments on the River Values Report for the forthcoming Wild and Scenic Rivers Plan for the Mt. Hood National Forest.

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1 Nov 2018

TO: comments-pacificnorthwest-mthood@fs.fed.us

CC: jennieoconnorcard@fs.fed.us

Subject: Mt. Hood Wild and Scenic Rivers Planning — comments on the River Values Report

Dear Forest Service:

Please accept the following comments from Oregon Wild concerning the River Values Report for Wild and Scenic Rivers Planning on the Mt Hood NF, <https://www.fs.usda.gov/project/?project=54674>. Oregon Wild represents 20,000 members and supporters who share our mission to protect and restore Oregon's wildlands, wildlife, and water as an enduring legacy.

The River Values Report will be used in the preparation of comprehensive river plan(s) for wild & scenic rivers on the Mt Hood National Forest (that do not already have river management plans), including the Collawash River, Eagle Creek, East Fork Hood River, Fifteenmile Creek, Fish Creek, Middle Fork Hood River, South Fork Clackamas River, South Fork Roaring River, and Zigzag River.

Oregon Wild supports the Forest Service's effort to prepare comprehensive plans for the wild & scenic rivers on the Mt Hood NF. We urge the Forest Service to recognize river values that will aid in the preparation of truly *comprehensive* plans that establish conservative requirements that meaningfully protect the outstandingly remarkable values for each wild & scenic river.

We urge the Forest Service to adopt the river values described in the "Report Language" that is in the congressional record for the 2009 Omnibus Bill. In particular we urge the Forest Service to consider adopting ORVs that will best conserve and enhance the special values for each river.

We especially encourage adoption of the following ORVs for ALL of the rivers that are being reviewed:

- **Fisheries** - to conserve fish and the habitat structures and dynamic processes that will ensure their persistence: river functions, hydrology/floodplain functions, instream flows, shade, wood recruitment/retention, gravel recruitment/retention, etc.;

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- **Scenic values** – to conserve the aesthetic qualities of wild & scenic rivers and their corridors, such as riverine features, mature and old forests, natural vegetation, minimal human footprint;
- **Naturalness** – to conserve the natural character of WSR corridors, with features that are predominantly shaped by natural processes;
- **Wildlife** - to conserve natural structures/functions/processes that support habitat for diverse native wildlife, both rare and common species;
- **Botany** - to conserve natural structures/functions/processes that support habitat for diverse native flora, both rare species and common species, and both aquatic and terrestrial;
- **Climate Resilience/Carbon Cycle** – to conserve the riparian and watershed functions that help create conditions that are resilient to climate warming, amplified hydrological cycle, and increasing extreme events, AND to conserve a natural carbon cycle that maintains natural processes that capture, store, and release carbon;
- **Water Quality** – to conserve the water quality that supports fish, wildlife, recreation and other values.

Adopting these river values will ensure that the wild & scenic rivers on the Mt Hood are properly conserved according to the expectations of Congress and the public.

The FS should NOT determine *exceptional* character of these wild & scenic rivers compared to nearby landscapes that are somewhat protected by the Northwest Forest Plan or have miraculously escaped the saws to date. The exceptional character of these river values must be considered in light of the national average for rivers that flow through both public and private lands. Also, if the values listed above are not *exceptional* today, they will become exceptional over time as these river values are conserved within the designated corridors, while active management increasingly degrades the surrounding landscape.

Oregon Wild supports low-impact recreation on public lands, including wild & scenic river corridors. However, we urge some caution in designating **recreation** as an outstandingly remarkable river value because some forms of recreation can pose a substantial threat to conservation of other outstandingly remarkable values such as wildlife, fisheries, and botany. Where recreation is a desired goal, it should be conditioned to ensure it is managed in harmony with the other ORVs.

Historical features should not be designated as ORVs where they interfere with other important river values described above. Old roads, pipelines, and diversions often conflict with conservation of fish, wildlife, free-flowing rivers, etc.

We hope this planning process can be used to identify opportunities to remove roads, culverts, and diversions in the wild & scenic river corridors that interfere with natural hydrology, floodplain functions, and water/wood/sediment functions.

Sincerely,

A handwritten signature in black ink that reads "Doug Heiken". The signature is written in a cursive, flowing style.

Doug Heiken

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