

From: [Thomas Horning](#)
To: [FS-comments-pacificnorthwest-mthood](#)
Subject: Comments to Mt.Hood River Values Report
Date: Tuesday, October 30, 2018 1:06:26 AM
Attachments: [Comments River Values Report.docx](#)

See attached. - Tom Horning

Comments on River Values Report for Nine Wild and Scenic Rivers on the Mt. Hood National Forest

Thank you for this opportunity to make comments on the important first step in river planning with the Mt. Hood National Forest, Wild and Scenic River, “River Values Report”. Below are my comments after reviewing the document.

Comments for Collawash River page 15, at 4th sentence under Collawash River Findings Summary (above Figure 1.) where it says, “In addition, quality habitat for cold-water *Corydalis* within both segments of the Collawash River corridor make these segments outstandingly remarkable from a botanical standpoint”.

I am very familiar with this rare aquatic plant, *Corydalis aquae-gelidae*, having participated with cold water *Corydalis* survey protocols and reports that were assigned to and implemented by Eugene Water and Electric Board for the Oak Grove Fork of the Clackamas River and my own field surveys that encountered this plant. I also was party to cold-water *Corydalis* resource surveys completed by Portland General Electric (PGE) in the Oak Grove Fork during relicensing. Cold water *Corydalis* is locally abundant in the Oak Grove Fork, upstream of PGE’s Lake Harriet Dam. These rare and beautiful aquatic plants are found in some of the most pristine, cold water habitats found in the west side of the Cascades and deserve our recognition and protection.

From my many years as a biologist working in the Clackamas watershed, including the Collawash, I have yet to see or hear reports of cold-water *Corydalis* in the Collawash River. The Collawash River is a naturally warmer West Cascades watershed, whereas cold-water *Corydalis* is typically found in colder drainages that are more hydrologically stable, such as the upper Oak Grove Fork and Clackamas River as well as isolated cold springs and seeps. Now it is possible that there are isolated cold springs supporting cold water *Corydalis* in out of the way locations in the Collawash but has yet to be reported. If there are some isolated cold-water *Corydalis*

locations at small springs and seeps or the headwaters of the Collawash River, Mt. Hood National Forest Service botanist David Lebo may have more detailed reports on them if they exist. From my own experience with this easily identifiable rare plant and much time spent in and along the Collawash River, I have yet to observe a cold-water *Corydalis* along the mainstem of the river. Unless verified as being present in the Collawash, cold-water *Corydalis* would not appear to be an “outstandingly remarkable value” for this river. If they were verified in the Collawash that would be a different matter.

As far as outstandingly remarkable values, it is interesting that the Forest Service “Wild and Scenic Rivers Planning Story Map” for this report shows and describes the “Sugar Pine Botanical Area”. The rare, small stands of sugar pine in the upper Collawash are the most northerly stands of sugar pine on the west side of the Cascades (a few sugar pine stands on the east side Cascades in the Warm Springs Reservation are further north). In near proximity to the sugar pine are isolated old growth incense cedar as well, near the northern limit of their range on the west side of the Cascades. These two old growth conifer species in isolated vulnerable stands in the Collawash, may be a more suitable candidates for outstandingly remarkable value status.

Page 30 Comments on Eagle Creek, under “botany” where (other value) it says in the last sentence, “occurrences of this species in the Collawash River are documented...” appears to be an editing error where the word Eagle Creek was intended.

Page 45 and 46, comments on 15 Mile Creek. I whole heartily support the designation under “fisheries” of native steelhead as an outstandingly remarkable value for this river with its important core and genetic legacy population. I noticed that you are describing this population as a summer steelhead population (although an imprecise label) even though most of the spawning by these steelhead is completed by late June with most spawning earlier in the year. This is certainly more typical of winter steelhead with most of the pre-spawning migration taking place in late

winter to spring to their spawning sites. Typical summer and fall steelhead (although an imprecise label) migrate summer into fall with spawning in early winter which is much different than these fish.

Page 50 Comments on Fish Creek. There is incorrect information in the third paragraph where it says, “the Fish Creek barrier Free Fishing Pier.” This pier was destroyed by the 1996 Flood (100 year flood event) but was replaced by a whitewater boat launching ramp at the same parking area on the river.

Page 53 Comments on Fish Creek. The finding of fish populations and habitat as an outstandingly remarkable value is strongly supported with this stream being a stronghold for winter steelhead spawning and rearing as well as supporting other federally listed salmonids.

Page 60 and 61 Comments on Middle fork Hood River. The Forest Service is to be commended for listing bull trout as one of the outstandingly remarkable values for this river. Bull trout populations across their range have greatly declined for this cold, clean water adapted salmonid with it now being listed under the Endangered Species Act. As you state in the report this is the last native population of bull trout on the million-acre Mt. Hood National Forest and is a unique legacy population.

The End