Public Comments Received July 2023

NORTH CLACKAMAS WATERSHEDS COUNCIL

2416 SE Lake Road, Milwaukie, OR 97222 - 503-550-9282 – northclackamaswatersheds.org

July 31, 2023

TO: Ben Walczak, District Fish Biologist
Fish.Passage@ODFW.Oregon.Gov

CC: Greg Apke, Statewide Fish Passage Program Leader
Steve Niemela, North Willamette Watershed District Manager
Dave Stewart, Stream Restoration Biologist
Jim Brick, Lower Columbia Implementation Coordinator
Kregg Smith, Senior Policy Analyst
Leslie King, Commissioner

RE: Comments on revised Statewide Fish Passage Barrier Prioritization List

Thank you for the opportunity to comment on the updated Statewide Fish Passage Barrier Prioritization List, and for the Department's partnership with our Watershed Council to restore native fish populations for the people of Oregon.

In the past few years, the Watershed Council, in partnership with ODFW and other state and local partners, have completed both the North Clackamas Watershed Action Plan (NCWC, 2022), the North Clackamas Watersheds Temperature Study (NCWC, 2023), and the Assessment of Potential Barriers to Fish Passage in North Clackamas Watershed Council Area Streams (NCWC, 2023). These efforts, combined with our existing work to achieve fish passage and habitat restoration at Kellogg Dam, inform our priorities for fish passage. These studies have identified several priority fish passage barriers that pose both threats to native fish and opportunities for habitat access that capitalize on existing cold water, particularly at creek confluences with the Lower Willamette River where these channels provide summer refugia. All of these creek confluence barriers also have partially funded habitat restoration projects associated with them.

Several of these sites are not currently listed on the ODFW database, or are worthy of higher priority. We recommend ODFW staff and the Fish and Wildlife Commission to incorporate

these barriers as priority barriers, and we look forward to partnering to improve fish access to our watersheds.

Priority #1: Kellogg Dam

Location:	Kellogg Creek/Willamette Confluence in Milwaukie, OR
Coordinates:	45.441773, -122.641902
Passage:	Near-total barrier
Ownership:	ODOT
ODFW Status:	Listed in ODFW Database, Group 4 Priority
Ecological Uplift:	Create volitional fish passage for all stocks rearing and migrating through the Lower Willamette, complete floodplain habitat restoration upstream of dam, capitalize on summer cold water at confluence, and leverage existing restoration efforts.

Kellogg Dam is currently the #1 passage barrier owned by ODOT and #6 priority in the North Willamette Watershed as established by the Oregon Fish and Wildlife Commission. After securing Congressionally Directed Spending for the pre-design of this project, NCWC partnered with ODOT, American Rivers, and the City of Milwaukie and was awarded a $15M grant from NOAA Fisheries to fully design the project to restore volitional fish passage to the watershed and restore the lower Kellogg Creek floodplain through the 14-acre dam impoundment. However, because the project requires replacing McLoughlin Boulevard bridge, additional funding will be needed to complete construction. Placing this barrier as a higher priority on the Prioritization List will be a vital step in securing federal, private, and state construction funding and driving the project to completion.

Priority #2: Dean Creek @ Confluence with Mt. Scott Creek

Location:	Dean Creek at its confluence with Mt. Scott Creek
Coordinates:	45.426748, -122.580614
Passage:	Partial barrier
Ownership:	Union Pacific Railroad
ODFW Status:	Listed in ODFW Barrier Database, not prioritized
Ecological Uplift:	Create access to cold water in Dean Creek, and leverage adjacent habitat restoration project at 3 Creeks Natural Area

Dean Creek has been identified as a source of significant cold water during summer, and access to this creek will provide a critical summer refugia for rearing fish (NCWC, 2023). The two corrugated metal pipes at the mouth of Dean Creek are very small diameter, with one being partially filled with substrate. They also appear to be crushed or potentially failing in the middle. This restricts passage for fish during many flow conditions. This barrier is adjacent to a planned floodplain restoration in 3 Creeks Natural Area by Clackamas Water Environment Services, which increases the value of fixing this barrier.

Priority #3: River Forest Creek at River Forest Drive

Location:	River Forest Creek just upstream of Willamette Confluence
Coordinates:	45.41574773, -122.6543307
Passage:	Total barrier
Ownership:	Clackamas County
ODFW Status:	Listed in ODFW Database, not prioritized
Ecological Uplift:	Create volitional fish passage for all stocks rearing and migrating through the Lower Willamette, hydraulically disconnect the creek from the adjacent lake to remove temperature hazard, and leverage existing restoration efforts downstream of culvert.

River Forest Creek passes through two stacked impassable pipes under River Forest Drive, just upstream of its confluence with the Lower Willamette. The Council, with funding from OWEB and Meyer Memorial Trust, is restoring the Willamette-River Forest Creek confluence between this barrier and the Willamette River. The current culverts impound River Forest Lake and create a complete barrier to upstream passage of migratory fish into River Forest Creek watershed. During the summer months, River Forest Lake heats up significantly creating significant water quality issues. A combination of barrier removal and hydraulic disconnection of River Forest Creek from the lake could combine to create unrestricted access into the watershed where cold water exists upstream in the summer. The Watershed Council is an interested partner in fundraising the design for this project in partnership with ODFW, Clackamas County, and multiple local residents. The Council is already working with key residents, including the owners of the parcel containing impoundment outflow and the two properties at the Willamette confluence.

Priority #4: Walta Vista & River Road Culverts, Lower Boardman Creek

Location:	Boardman Creek just upstream of Willamette Confluence
Coordinates:	45.2352, -122.3749
Passage:	Total barrier
Ownership:	Clackamas County
ODFW Status:	Not in ODFW Barrier Database
Ecological Uplift:	Create volitional fish passage for all stocks rearing and migrating through the Lower Willamette, capitalize on summer cold water at confluence, and leverage existing restoration efforts downstream of culvert.

Boardman Creek passes through two impassable culverts at SE Walta Vista and River Road. This is a key area between the Boardman/Willamette Confluence, where we are designing a habitat restoration project with funding from Oregon DSL and the Lamb Foundation, and habitat restoration conducted upstream at Boardman Wetlands. Boardman Creek is cold-water refugia during the summer (NCWC, 2023). A 30% design exists for the culvert

replacement, but has not been implemented due to funding constraints, which is made difficult by the absence of this barrier on the ODFW list. Updating this list will make funding more likely. Clackamas County is an interested partner in this project.

Priority #5: Thiessen Road, Kellogg Creek

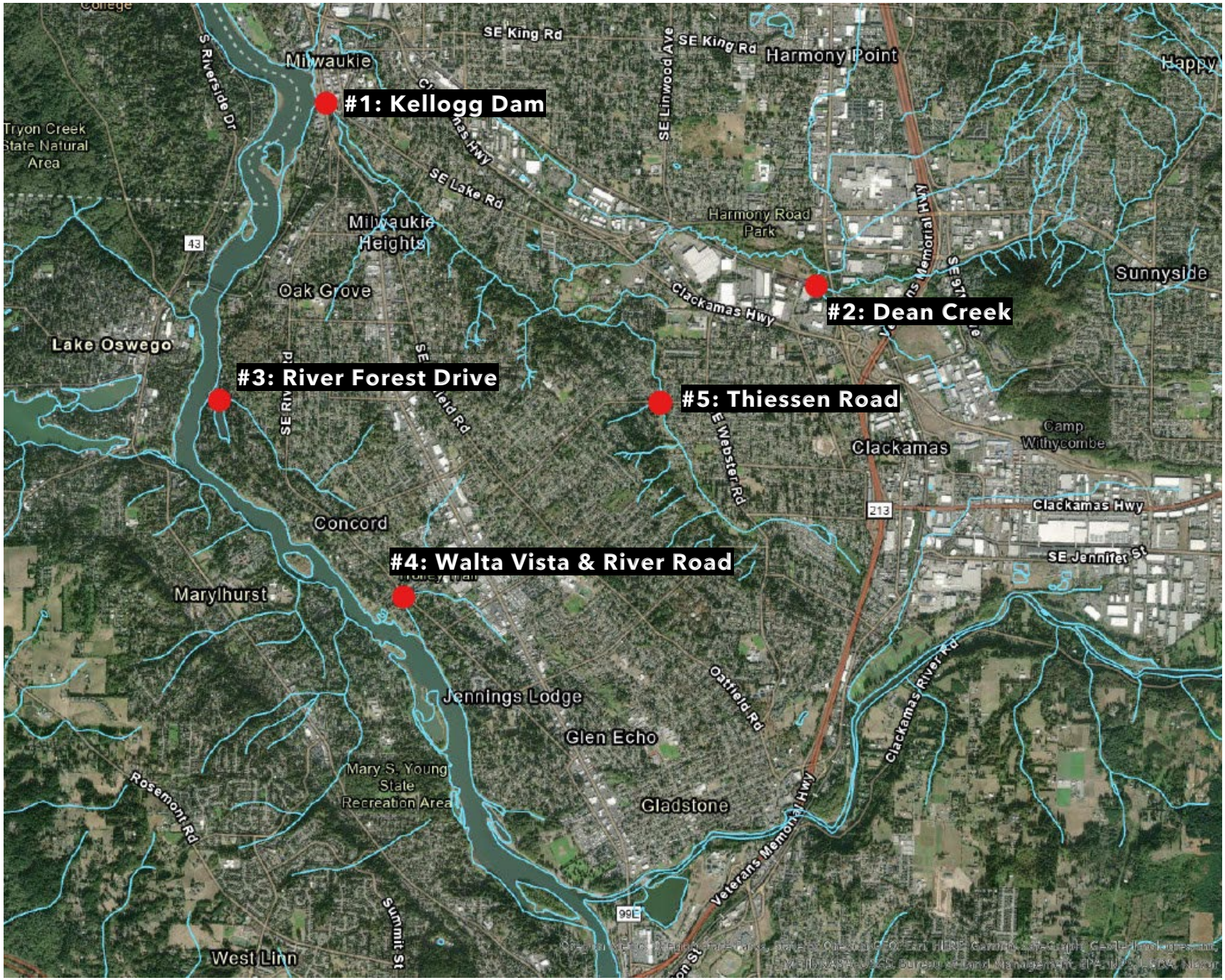
Location:	Kellogg Creek at Thiessen Road crossing
Coordinates:	45.416177, -122.599253
Passage:	Partial barrier
Ownership:	Clackamas County
ODFW Status:	Not listed in ODFW Database, not prioritized
Ecological Uplift:	Leverage existing restoration efforts upstream at Parmenter Ponds and existing culvert replacement CIP

Kellogg Creek flows under Thiessen Road through an undersized culvert causing the creek to back up and flood the road and upstream properties, as well as creating a hydraulic passage barrier for fish during certain flows. This culvert is just upstream of significant habitat restoration work underway at Parmenter Ponds through NCWC's Streamside Stewards program. This culvert replacement is currently funded as a CIP project in partnership with WES and Clackamas County DTD. However, there is potential to work with adjacent landowners to turn the culvert replacement into a larger floodplain restoration project that simultaneously provides broader habitat uplift and improves water quality and temperature via reactivation of the floodplain and/or hyopheric zone. The Council will support WES in landowner to expand the scope of the restoration work. Inclusion of this culvert in the ODFW database is necessary to have a compelling case to leverage federal, state (non-ODFW) and private sources.

Thank you for your work to restore fish habitat and your partnership with the Council. The fish, wildlife, and people of Oregon are directly benefitting from these efforts.

Sincerely,

Neil Schulman
Executive Director


#1: Kellogg Dam
#2: Dean Creek
#3: River Forest Drive
#4: Walta Vista & River Road
#5: Thiessen Road
Milwaukie
Harmony Point
Happy
Tryon Creek State Natural Area
SE King Rd
SE Linwood Ave
S Riverside Dr
Clackamas Hwy
SE Lake Rd
Milwaukie Heights
Harmony Road Park
Sunnyside
Oak Grove
Lake Oswego
Clackamas
Camp Withycombe
E Webster Rd
Concord
Marylhurst
Jennings Lodge
Glen Echo
Oatfield Rd
Clackamas River Rd
Mary S. Young State Recreation Area
Gladstone
Rosemont Rd
Veterans Memorial Hwy
Summit St
West Linn
SE Jennifer St
43
213
99E

ROGUE BASIN
PARTNERSHIP

July 22, 2023

Fish Passage Program
Oregon Department of Fish and Wildlife
4034 Fairview Industrial Drive SE
Salem, Oregon 97302

To whom it may concern,

Thank you for the opportunity to provide comment regarding ODFW's Statewide Fish Passage Barrier Prioritization List. The Rogue Basin Partnership (RBP) uses this list to guide and prioritize fish passage restoration work in Rogue River tributaries. We are very appreciative of ODFW's effort directed at the development and maintenance of this priority list.

RBP is an ongoing collaboration of 23 organizations dedicated to advancing ecosystem restoration in the Rogue River Basin. RBP's Rogue Restoration Action Plan (RRAP) identifies improving fish passage among the highest of priorities in the restoration of fish and wildlife populations in the Basin. Specifically, Strategy 3.2 in the RRAP is: "implement priority barrier removal projects by securing landowner agreements and funding, contract technical support to develop design and engineering cost estimates, conduct assessments and studies for review, and manage construction contractors to complete barrier removal efforts."

RBP respectfully offers the following comments related to the barrier list update:

1. The Rogue River Basin has historically been hotter and drier than other western/coastal Oregon stream systems. Climate change models forecast that this trend will continue and accelerate in the future. Providing volitional fish passage for all species and life stages of native migratory fish is crucial for access to cool water spawning and rearing habitats. While this need is reflected in ODFW's methodology for determining fish passage barrier priorities, if there is a method to increase the priority of those fish passage barriers that impede access to particularly important cool-water reaches that is *not* part of the current prioritization process, we advocate that you develop it. For example, "priority, cool-water habitats" could be included among the characteristics that prompt the use of "auto up."

2. We recommend lowering the priority of Newberryman push-up dam (ID 22780) and Taylor Diversion push-up dam (ID 22855) on the mainstem Applegate River. These are "Group 4" barriers and each have been assigned a "Passage Level" of "1," while other mainstem Applegate diversions are not included on the list at all. RBP and partners believe Newberryman and Taylor have little or no impact to upstream migration of native migratory

fish of any life stage at any time of year. Lowering the priority of these barriers could be accomplished by changing the "Passage Level" to "0" or by amending the currently assigned "auto up/down" values. This would result in elevating the priority of more impactful barriers on the list.

3. We recommend lowering the priority of Brown Ditch (ID 22772). In recent years, the configuration and size of this push-up dam has not warranted a "Passage Level" of "3." There are many other permanent or partially permanent concrete structures that are lower priority on the current list. RBP and partners believe that these more permanent structures are far more impactful that Brown Ditch. Lowering the priority of Brown Ditch could be accomplish by reducing its "Passage Level" to "2" or "1" and/or or by amending the currently assigned "auto up/down" values. This would result in elevating the priority of more impactful barriers on the list.

4. We recommend that Lower Phillips Dam be added to the priority list. This dam is a channel spanning concrete structure on the Little Applegate River that creates a nearly 3-foot high barrier at low flow times of year, creating a migration barrier to adult and juvenile native migratory fishes.

5. If we correctly interpret the methodology in developing the "Average Habitat Quantity" score, we have identified several discrepancies in that category on the priority list that influence a barrier's position on that list. For example:

    a. On North Fork Little Butte Creek, Zundel Dam (ID 22866) has been assigned an "Average Habitat Quantity" Score of "3.3" while the Medford Irrigation District diversion on North Fork Little Butte (ID 7401) has been assigned "Average Habitat Quantity" Score of "27.6." However, these two barriers are situated less than 0.5 miles apart from each other with no major tributaries between.

    b. On Little Applegate, the Upper South Ditch (ID 23030) has an "Average Habitat Quantity" Score of "45" while other downstream barriers in the Little Applegate system have been assigned lower "Average Habitat Quantity" scores (i.e. Upper Phillips Diversion (ID 22783) has a score of "18.4").

    c. On Williams Creek, the Watts Toppin Diversion (ID 5911) has been assigned an "Average Habitat Quantity" score of "23.1" while a downstream barrier, the Williams Creek Boulder Push-up Dam has been assigned a lower score of "20.4."

    While RBP has not conducted an exhaustive review of this list for accuracy in this regard, other similar discrepancies may exist. We recommend ODFW review for accuracy as staff resources allow.

6. Eight fish passage priority barriers have been permanently removed by RBP partners since the last prioritization update. We recommend that these barriers be removed from the barrier list. These are:

    1. Pielle 1; Salt Creek (ID 22942)

2. Pielle 2; Salt Creek (ID 22943)
3. Krumwiede 1; Salt Creek (ID 22939)
4. C2 #3; Salt Creek (ID 22944)
5. C2 #4; Salt Creek (ID 22945)
6. Cascade Ranch Diversion; Lost Creek (ID 28253)
7. Smith/Meyer/Roper; Ashland Creek (ID 23045)
8. Santilla Fish Farm Dam; Slate Creek (ID 5909)

In addition, before the end of the 2023 instream work period, RBP partners plan to remove the following barriers allowing them to be removed from the list (following successful implementation):

1. Takelma Creek Dam (formerly known as Squaw Creek); Takelma Creek (ID 46004)
2. Lovelace Dam; Slate Creek (ID 22812)

Thank you for the opportunity to provide input to this important effort. To re-iterate, RBP is very supportive of the effort directed at the development and maintenance of ODFW's Fish Passage Priority List. We find it extremely useful in guiding our work with landowners and irrigators to improve fish passage around the Rogue River Basin.

Sincerely,

Sara Mosser, Executive Director
Rogue Basin Partnership

Oregon Department of Fish & Wildlife
Fish Passage Barrier Prioritization Team

July 31, 2023
emailed to: fish.passage@odfw.oregon.gov

SUBJECT: 5-YEAR UPDATE TO THE STATEWIDE FISH PASSAGE BARRIER PRIORITY LIST

On behalf of the Deschutes Redbands Chapter of Trout Unlimited and its 720 members throughout the Deschutes Basin, we would like to express our appreciation for this opportunity to participate in the prioritization process of 2023. We would also like to commend ODFW for its clear presentation of this approach. The process developed to date brings a rational and objective perspective to prioritization as ODFW pursues its mission to restore fish passage at specific locations based on a consistent prioritization formula. However, in our opinion, the prioritization process could be enhanced as follows:

1. The algorithm for quantitative ranking of fish barriers does not include a calculation or assessment of the likelihood/feasibility that the passage obstacle can or will be eliminated. Fish passage at Hells Canyon illustrates this point. While it has been highly ranked in the past (at one point the highest ranking in the state), there is general consensus that, as a practical matter, passage will not be restored in the foreseeable future. If the priority ranking is to be a tool for directing departmental restoration work and investment within near term budget cycles, a practical assessment of basic feasibility/implementation timing should be an integral part of the process. If the Department finds basic feasibility impediments to restoration, perhaps that should then lead to negative points in the quantitative algorithm used for rankling. On the flip side, if work has already been completed for a specific site, e.g., baseline engineering design, then positive points could be added to the ranking score. While there are various ways that basic feasibility criteria could be addressed, it seems clear that restoration efforts should be prioritized at sites demonstrating a realistic near-term prospect for elimination of the barrier.

2. Another point concerns public involvement in the process. Currently, public access to governmental information through FOIA is both slow and expensive for interested parties. We would like to see a facilitated process for accommodating public input in the prioritization process. The Department has an effective system for public notification of regulations, committee meetings etc. The barrier prioritization process could use this public notification system to provide interested parties opportunity for input before the algorithmic ranking is finalized. Also, an informed public can facilitate funding efforts for restoration.

3. We appreciate that climate change has been identified as a new and important factor in the barrier evaluation process. While it is not clear how this will be worked into the current process, we support any reasonable effort to accommodate climate change factors. An example might be to acknowledge thermal barriers to passage as distinguished from physical barriers. However, we also see the potential for unintended consequences if, for instance, climate change criteria do not account for different species' life histories and regional climatic conditions.

Thank you for the opportunity to submit these comments.

Sincerely,

Mike Tripp, Advocacy Chair & Past President
Deschutes Redbands Chapter – Trout Unlimited
16 N.W. Kansas Avenue, Bend, OR 97703
trippm10@gmail.com

Shaun Pigott, President
Deschutes Redbands Chapter
spigott@teleport.com

July 20, 2023

ODFW Fish Passage Program
Oregon Department of Fish & Wildlife
4034 Fairview Industrial Dr SE
Salem, OR 97302

Re: Fish Passage Barrier Prioritization List Update

Mr. Apke and Members of the ODFW Fish Passage Program;

Thank you for the opportunity to comment on the Oregon Department of Fish & Wildlife's process for the 2024 update to the fish passage priority barrier list. Generally, the Native Fish Society supports ODFW's methods for prioritizing barriers statewide, utilizing the developed formula. Our organization fully supports incorporating climate change into the current model in order to prioritize its effect statewide.

In 2020, ODFW adopted a Climate and Ocean Change Policy. This policy highlights the harmful effects that climate change is having on our native fish and wildlife in the state of Oregon. According to the policy, Oregon will experience increased thermal temperatures, decreased water flow, and increased drought throughout the state. This policy should be incorporated into the fish passage priority formula during 2024 update.

ODFW should consider incorporating climate change variables into their fish passage priority formula for specific barriers. These climate change variables include, but are not limited to, temperature and flow. Identifying barriers in watersheds that have a higher risk to native fish and wildlife being affected due to these variables will help prioritize solutions that will help with conservation efforts and the protection of our native species.

Native Fish Society is committed to working with ODFW to incorporate the effects of future climate change into the prioritization methods for ODFW's Fish Passage Priority Barrier List.

Sincerely,

Kirk Blaine
Southern Oregon Coordinator

Liz Perkin
Northern Oregon Coordinator

Public Comments Received Nov. 2024

ROGUE BASIN
PARTNERSHIP

November 26, 2024

Fish Passage Program
Oregon Department of Fish and Wildlife
4034 Fairview Industrial Drive SE
Salem, Oregon 97302

To whom it may concern,

Thank you for this renewed opportunity to provide comment regarding ODFW's Statewide Fish Passage Barrier Prioritization List update. The Rogue Basin Partnership (RBP) uses this list to guide and prioritize fish passage restoration work in Rogue River tributaries. We are very appreciative of ODFW's effort directed at the development and maintenance of this priority list. We also appreciate the incorporation of our July 2023 comments into the most recent iteration of the Priority List.

RBP is an ongoing collaboration of 23 organizations dedicated to advancing ecosystem restoration in the Rogue River Basin. RBP's Rogue Restoration Action Plan (RRAP) identifies improving fish passage among the highest of priorities in the restoration of fish and wildlife populations in the Basin. Specifically, Strategy 3.2 in the RRAP is: "implement priority barrier removal projects by securing landowner agreements and funding, contract technical support to develop design and engineering cost estimates, conduct assessments and studies for review, and manage construction contractors to complete barrier removal efforts."

RBP respectfully offers the following additional comments related to the barrier list update:

1. The Middle Fork Diversion Dam (Barrier ID #19246) should be identified in "Subbasin (HUC8)" column as "Upper Rogue," not "Middle Rogue"

2. Lower Alphonso Dam (Barrier ID # 22824) should be identified in "Subbasin (HUC8)" column as "Middle Rogue," not "Upper Rogue."

3. An unnamed dam on Poorman Creek (Barrier ID #46002) a Grave Creek tributary should be identified in "Subbasin (HUC8)" column as "Lower Rogue," not "Upper Rogue."

4. At Cascade Ranch Diversion Dam (Barrier ID # 22764), the Rogue River Watershed Council, an RBP partner organization, has completed a project that installed a pre-cast irrigation structure eliminating the need for the annual construction of a push-up dam at that site. The fish screening infrastructure was also updated. Therefore, we recommend that barrier be removed from the list.

5. At LBID Dam (Barrier ID 28277), an “Auto-up” value of “4” has been assigned. However, the “Auto-up” tab/sheet assign an auto-up value of “1.” We believe “1” or “0” to be the correct auto-up value and the “Auto up” column in the “Draft List” tab/sheet should be changed from “4” to “1.” Similarly, at White Brown Push-up Dam (Barrier ID # 22796) and Floyd Ditch Push-up Dam (Barrier ID # 22854), the “Auto-up” column values on the “Draft List” tab/sheet do not match the values on the “Auto-up” tab/sheet. We have recommend reviewing “auto-up” values for accuracy.

6. At LBID Dam (Barrier ID 28277), we believe Small-scale Suckers are present though not identified in the “Species” column. Suckers are shown to be present at Little Butte Creek barriers both upstream and downstream of the LBID Dam. Therefore, suckers should be added to the “Species” column and the “# NMF Species” column should be changed from “5” to “6”

7. At Zundel Dam (Barrier ID 22866), 5 species of NMF have been identified. At MID NFLB (Barrier ID # 7401), 6 species of NMF have been identified. This difference is because Small-scale Suckers are shown to be present at MID NFLB and not at Zundel. These barriers are less than 0.5 miles apart. As such, we are unclear if this an error. If so, this would affect the “# NMF Species” score. The same is true for Spring Chinook – they are shown as present at MID NFLB but not at any other Little Butte Creek barriers (though this would not alter the “# NMF Species” score as Fall Chinook are already present at all Little Butte barriers).

Thank you for the opportunity to provide input to this important effort. To re-iterate, RBP is very supportive of the effort directed at the development and maintenance of ODFW’s Fish Passage Priority List. We find it extremely useful in guiding our work with landowners and irrigators to improve fish passage around the Rogue River Basin.

Sincerely,

Sara Mosser, Executive Director
Rogue Basin Partnership

ODFW Fish Passage Program
Oregon Department of Fish & Wildlife
4034 Fairview Industrial Dr SE
Salem, OR 97302

RE: ODFW revised statewide Fish Passage Barrier Priority List

Oregon Department of Fish and Wildlife Fish Passage Task Force,

The Wild Salmon Center appreciates the opportunity to provide feedback on the Oregon Department of Fish and Wildlife's (ODFW) revised statewide Fish Passage Barrier Priority List. Wild Salmon Center (WSC) is the leading conservation organization working on Pacific salmon across the Pacific Rim. We know that healthy wild salmon populations are important to all of us. They provide culture, subsistence, thriving local economies, Tribal, commercial, and recreational harvest opportunities, and when managed appropriately, habitats that provide clean water for communities, fish, and wildlife.

WSC supports ODFW's efforts to prioritize barriers statewide to help direct enforcement and restoration efforts throughout Oregon. We commend ODFW for incorporating climate change predictions and cold water access into the barrier prioritization framework during the 2024 update. This forward-thinking approach acknowledges the critical role these factors play in fish passage and habitat connectivity. Additionally, including these factors is an example of ODFW adhering to its Climate and Ocean Change Policy, adopted in July 2020.

WSC offers the following feedback on the proposed barrier assessment and prioritization process.

- Page 5 "Level of Fish Passage" - There is no quantitative measure that accounts for the percentage of time a crossing serves as a migratory barrier for both adult and juvenile fish. For instance, the scoring system for values #3 and #1 assigns a flat score regardless of whether the crossing is a barrier 10%, 30%, 60%, or more of the time. In contrast, the Washington Department of Fish and Wildlife (WDFW) employs a quantitative approach that incorporates passage percentage (33%, 60%, 100%), offering a more precise measure of how often a crossing restricts fish passage during migration periods. Without quantitative measurement across barriers, prioritization of fish passage structures cannot occur based upon anticipated fish benefit.

- Page 6, "Listed Native Migratory Fish" - One of the scoring factors for prioritization is whether there are "listed" native migratory fish below the barrier. If so, the barrier will receive a higher score compared to one without listed species. A barrier should be a red flag and considered for correction regardless of the status of the fish rather than waiting until a species is "listed." Failure to consider all barriers may result in the omission of barriers in need of replacement, and missed opportunities to coordinate on appropriate sizing criteria for barriers being replaced based on transportation system upgrades alone (e.g. a local road department replacing a failing culvert with one of the same size due to unawareness of the fish passage problem).

- Page 6, "Species Diversity" - We value that for each NMF species present, there are points awarded to the overall score. It would be helpful if the document, or an attachment, could clearly identify at what frequency this data is field verified and updated.

During future development, WSC recommends that ODFW complement the proposed barrier prioritization, which incorporates climate change factors, with development of a detailed methodology for designing fish passage crossings that accounts for climate change predictions. This could include guidance on anticipated changes to bank full width, flow regimes, and hydrologic variability. Integrating such design considerations will ensure crossings remain effective and resilient in changing environmental conditions. WDFW has developed a similar framework and web application that practitioners frequently use to design fish passage crossings. Like other work, leveraging lessons learned from this framework and tool could help ODFW address climate-related changes to stream channel morphology and lead to improve both the permitting and design process for more resilient water-crossing structures.

Again, thank you for the opportunity to comment on revisions to the statewide Fish Passage Barrier Priority List and the methods used to assess it. We ask the department to consider the following recommendations and include them in the update for adoption in April 2025 or subsequent revisions.

Sincerely,

Kirk Blaine
Sr. Program Manager for Wild Fish - Oregon
Wild Salmon Center
kblaine@wildsalmoncenter.org

Oregon
Tina Kotek, Governor

Department of Transportation
Environmental and Hydraulic
Engineering Section
4040 Fairview Industrial Dr. SE
Salem, OR 97302-1142
Phone: (503) 986-3459
Fax: (503) 986-3407

November 26, 2024

Katherine Nordholm
Fish Screens and Passage Coordinator
4034 Fairview Industrial Dr. SE
Salem, OR 97302

Mx. Norldholm,

The Oregon Department of Transportation (ODOT) appreciates the opportunity to provide public comments on the development of the Oregon Department of Fish and Wildlife's (ODFW) draft 2024 Statewide Fish Passage Barrier Priority List. This list is central to the mission of the ODOT Fish Passage Program in delivering on our commitment to the Oregon Plan for Salmon and Watersheds. As you know, the ODOT Fish Passage Program uses this list to prioritize available program funding across the State Highway network, leverage other business lines within ODOT, pursue applicable grant opportunities, and collaborate with Federal, State, Local, and Tribal partners.

Kudos to you and team for recognizing the need for including climate change and stream temperature metrics as it pertains to fish passage. ODOT also appreciates the critical ODFW internal review of the previous and existing prioritization process, and the robust conversations on related considerations with ODFW Fish Passage Task Force Members.

In general, ODOT does not have any significant concerns or comments on the development of this proposed prioritization methodology or resulting priority list. Two general comments pertaining to consistency with habitat quantity and species distribution scoring are provided below. Specific comments for ODOT owned locations identified in the draft 2024 list are provided as an attachment for your review.

Habitat Quantity Methodology
ODOT recognizes that the current habitat quantity score is based on miles of fish habitat that would become accessible to the Native Migratory Fish (NMF) species currently present below the barrier, if passage were provided. We understand that the value is measured as the number of miles between the priority barrier and the next complete barrier upstream, due to an artificial obstruction or naturally occurring barrier, or the end of fish use. Likewise, we appreciate that the ODFW Fish Passage Barrier Database contains approximately 41,839 inventoried Artificial Obstructions (AOs).

Considering NMF population declines, and the urgent need to address passage at high priority barriers in the near term, ODOT recommends incorporating documented AOs with partial passage designations upstream of priority barriers into the prioritization equation. This can help separate project locations with multiple documented passage barriers upstream from locations where no documented barriers are present. The key difference with this separation is to see where planned actions can immediately benefit populations of NMF, versus a project opening access into a system with multiple additional barriers that are unaccounted for in current prioritization methods.

Currently this metric seems to be inconsistently used in the "Auto up/down" options for ODFW District staff. A statewide standardized process can better help with consistency across various Districts. One option would be to reduce the number of miles a site receives credit for by the number of documented AOs upstream. Another alternative would be to reduce the habitat quality score for locations where multiple AOs would restrict movement

of NMF in areas upstream of the priority location. As NMF are restricted to the habitat that is made accessible following priority barrier removal, it seems prudent to restrict the scoring potential of these locations to coincide with the actual species benefit resulting from the priority barrier removal. With limited resources, project sponsors can better prioritize funding where the habitat quantity or quality value incorporated into the methodology reflects the actual habitat made accessible for NMF through project actions, and avoid allocating resources to projects where habitat gains are only “on paper” or otherwise misconstrued.

NMF Species Distribution
With the adoption of updated Oregon Administrative Rules in 2023, several new species of NMF were formally recognized by ODFW to be considered for passage rules and criteria. In review of the draft priority list, there seems to be some discrepancy on ODOT-owned locations for where these species may occur. It is recommended that distributions of species recently added under OARs be cross checked against the proposed list for consistency.

A consistent species determination method is recommended for ODFW Districts across the state. One ODFW District using professional judgment as opposed to another District using documented observations at barrier locations can skew the priority list for species with limited available distribution datasets. The addition of one or two species for one location, and not another, can skew the resulting priority of these barriers. This is especially apparent on a statewide scale. Specific ODOT examples to review are provided in the attached comments.

Again, ODOT expresses its gratitude for your work and development of this important list. Please do not hesitate to reach out if we can provide more clarity or discussion into any of these comments.

Best,

Allen Gillette
Aquatic Biology and Fish Passage Program Coordinator
ODOT Environmental and Hydraulic Engineering Section
4040 Fairview Industrial Dr. Se
Salem, OR 97302
Office: (503) 986-3459

Oregon Department of Transportation Comments on ODFW Draft Statewide High Priority Barrier List 2024				
Subbasin (HUC8)	**ODFW Barrier ID**	**Barrier Name**	**Stream Name**	**Comment**
Middle Rogue	3752	Unnamed Culvert	Galls Creek	Please confirm Psg. Level of "3" for this location. Structure contains fish passage improvement devices and may be mostly passable during periods of migration for local species and life histories when fish passage flows are present.
Sixes	3951	Unnamed Culvert	Boulder Creek	Please confirm with ODFW District regarding Auto Down score applicability with multiple AOs (dams) documented downstream in ODFW Barrier database. Please confirm species used in priority equation. Western Brook Lamprey may also be present.
Sixes	4490	Unnamed Culvert	Jim Creek	Please confirm species used in priority equation. Western Brook and Pacific Lamprey may also be present.
Wilson-Trask-Nestucca	4553	Unnamed Culvert	Killiam Creek	Please confirm passage level of "3". During periods of migration, this structure seems to be a significant barrier to adults. Please also confirm species used in priority equation, as Western Brook Lamprey may also be present.
North Umpqua	5774	Unnamed Culvert	Bogus Creek	Please confirm species and life stages used in priority equation with ODFW District Office. ODFW telemetry studies in the basin suggest summer steelhead may spawn in tributaries of this size and location, with winter steelhead showing preference for
Lower Willamette	7381	Unnamed Culvert	Tryon Creek	Please confirm species used in priority equation, specifically; expected Large Scale Sucker distribution in this system.
Nehalem	7688	Unnamed Culvert	Knickerson Creek	Please confirm Psg. Level of "4" used in equation, as ODFW barrier database includes "Completely passable" under
Klamath	9318	Unnamed Culvert	Moss Creek	Please confirm Psg. Level of "3" used in equation, as ODFW Barrier database includes "Completely passable" under
Necanicum	9398	Unnamed Culvert	Asbury Creek	Please confirm species used in priority equation. Western Brook Lamprey may also be present.
Powder	9416	Unnamed Culvert	Fish Creek	Please confirm species used in priority equation. This location may have also have current or historic Bull Trout use (ESA-T), and historic Summer STL use (ESA - T).
Chetco	10457	Unnamed Culvert	Shy Creek	Please confirm species used in priority equation. Western Brook and Pacific Lamprey may also be present.
Siuslaw	10886	Unnamed Culvert	Hollo Creek	Please confirm species used in priority equation. Fall Chinook juveniles may use this location as refugia during rearing / downstream migration with proximity to mainstem Siuslaw. Western Brook Lamprey may also be present.
Wilson-Trask-Nestucca	11563	Unnamed Culvert	Fox Creek	Please confirm species used in priority equation. Western Brook Lamprey may also be present.
Lower Willamette	11766	Kellogg Dam	Kellogg Creek	Please confirm with ODFW District regarding Auto Down score applicability with multiple (12+) AOs documented upstream in ODFW Barrier database. Please confirm species distribution of Large Scale Sucker potential at this location.

Oregon Department of Transportation Comments on ODFW Draft Statewide High Priority Barrier List 2024				
Subbasin (HUC8)	**ODFW Barrier ID**	**Barrier Name**	**Stream Name**	**Comment**
Lower Columbia-Clatskanie	11800	Unnamed Culvert	Fox Creek	Please include City of Rainier under Owner information. Please confirm species used in priority equation. Pacific Lamprey may also be present. Western Brook lamprey spawning recently observed by ODFW staff (Pete Baki) at this location.
Coquille	12257	MF Coquille Falls	Middle Fork Coquille River	Please confirm species used in priority equation. Western Brook Lamprey may also be present.
Wilson-Trask-Nestucca	14082	Unnamed Culvert	Butte Creek	Please confirm species used in priority equation. Western Brook Lamprey may also be present.
South Umpqua	14541	Unnamed Culvert	Canyon Creek	Please confirm barrier type for this location. Field visits have this location identified as concrete chute, with no cover. Please confirm Psg. level of "3", as this location may not provide any passage for any species life stages present in Canyon Creek. Please confirm habitat quality and stream temperature scoring due to recent severe fires in watershed.
North Umpqua	15632	Unnamed Culvert	Fairview Creek	Please confirm each species habitat distance used in priority equation corresponds to ODFW District data for habitat available upstream of OR 138E. Previous discrepancies included coho and steelhead habitat availability upstream of natural bedrock partial barrier. ODFW telemetry studies in the basin suggest summer steelhead may spawn in tributaries of this size and location, with winter steelhead showing preference for spawning in mainstem
Lower Malheur	17046, 17845	Unnamed Culvert	Pole Creek	Please confirm Psg. level of "5" used in equation. ODOT culvert inventory data and recent (2023) staff site visits suggest structure may be backwatered, with swim through conditions provided under most flows.
Tualatin	24998	Unnamed Culvert	White Creek	Washington County is the current Owner / Operator of NW Gales Creek Road at this location.
Lower Malheur	33232, 38809	Unnamed Culvert	Calf Creek	Please confirm Psg. level of "5" used in equation. ODOT culvert inventory data suggests structure may be backwatered, with swim through conditions provided under most flows.
Lower Columbia-Clatskanie	33563	Unnamed Culvert	Merrill Creek	Please confirm structure type. A degraded fish ladder is located downstream from the highway crossing, and is a significant barrier. Please confirm species use at this location, as Western Brook Lamprey may also be present.
Nehalem	40024	Tide gate	Gallagher Slough	Please confirm this barrier is included in Statewide Prioritization Scoring
North Umpqua	4333	Unnamed Culvert	Old Hatchery Creek	Please confirm this barrier is included in Statewide Prioritization Scoring

CAROLLO LAW GROUP

Dominic Carollo
Managing Attorney
dcarollo@carollolegal.com · 541-957-5900
PO Box 2456, Roseburg, OR 97470
2315 Old Hwy 99 S., Roseburg, OR 97471

November 27, 2024

ODFW Fish Passage Program
4034 Fairview Industrial Drive SE
Salem, OR 97302

Via email: Fish.Passage@ODFW.Oregon.Gov

RE: COMMENTS OF WINCHESTER WATER CONTROL DISTRICT ON REVISED STATEWIDE FISH PASSAGE BARRIER PRIORITY LIST

On behalf of the Winchester Water Control District ("WWCD"), please accept the following comments on the Oregon Department of Fish and Wildlife's ("ODFW") revised Statewide Fish Passage Barrier Priority List ("revised priority list"), as well as a supplemental analysis by senior fisheries scientist Mr. Ian Courter, included and incorporated herein at "Attachment 1." In consideration of the following comments and attachment, WWCD requests that ODFW reconsider the ranking of Winchester Dam, and assign the Dam a "Group 8" ranking, as was found in the 2013 Statewide Fish Passage Priority List.

Introduction

WWCD opposes ODFW's revised priority list, both in its methodology, and in its ranking of the Winchester Dam. The revised priority list utilizes subjective methodology to inflate the Winchester Dam's ranking, without quantifiable data supporting the conclusions reached. This subjective methodology has caused the Winchester Dam's ranking to rise over 100 spots since 2013, despite WWCD having made improvements to the Dam's fish ladder in that time. Winchester Dam's ranking in the revised priority list is now higher than Galesville Dam, which is a complete passage barrier. For the reasons that follow, WWCD urges ODFW to revise its passage methodology and priority ranking, returning Winchester Dam to the ranking it held in 2013.

Background

The Winchester Dam was first constructed in 1890, and raised to its current height of 16 feet in 1907. The fish ladder at Winchester Dam was constructed in 1946, and modified in the 1980s. Subsequent changes to the fish ladder have been made to accommodate migratory salmonids and lampreys. A fish viewing window provides a popular stop along Highway 99 and Interstate 5, where the public can watch migratory fish pass upstream. An online livestream of the fish ladder attracts thousands of viewers, and provides up-to-date passage statistics.

In 2013, ODFW ranked the Winchester Dam at position 126 in the fish passage priority list. At that time, ODFW gave the Dam a "level 1" passage rating—the second best score a dam could receive. In 2019, ODFW unexplainably gave Winchester Dam a passage rating of "3"—a significant increase from the 2013 metric. This change, among others, caused Winchester Dam's ranking to increase by around 100 spots, despite no changes having been made to the Dam or its fish ladder in the interim. In 2024, further changes to the priority ranking methodology have again increased Winchester Dam's ranking.

WWCD strongly opposes the ranking of the Winchester Dam, and the methodology used by ODFW, and urges ODFW to revise the methodology and revise its ranking of the Winchester Dam.

Comments

Winchester Dam is located in a highly accessible, and highly visible stretch of the North Umpqua River. Tens-of-thousands of people drive past Winchester Dam each day, on Highway 99 or Interstate 5. The fish viewing window at Winchester Dam is a popular stop, providing public education on the upstream migration of Oregon's native salmonids. Downstream of Winchester Dam, Amacher Park provides developed RV sites, and a boat ramp catering to anglers and recreationalists.

Public viewing and recreation in and around Winchester Dam is continuous all year. Yet, there is no quantifiable data establishing that Winchester Dam creates a fish passage barrier. WWCD is not aware of any data or analysis which has actually sought to quantify the Dam's impact on migratory fish. Even excluding *quantifiable* data, WWCD is not aware of any confirmed instances where migratory fish have been unable to pass upstream through the fish ladder.

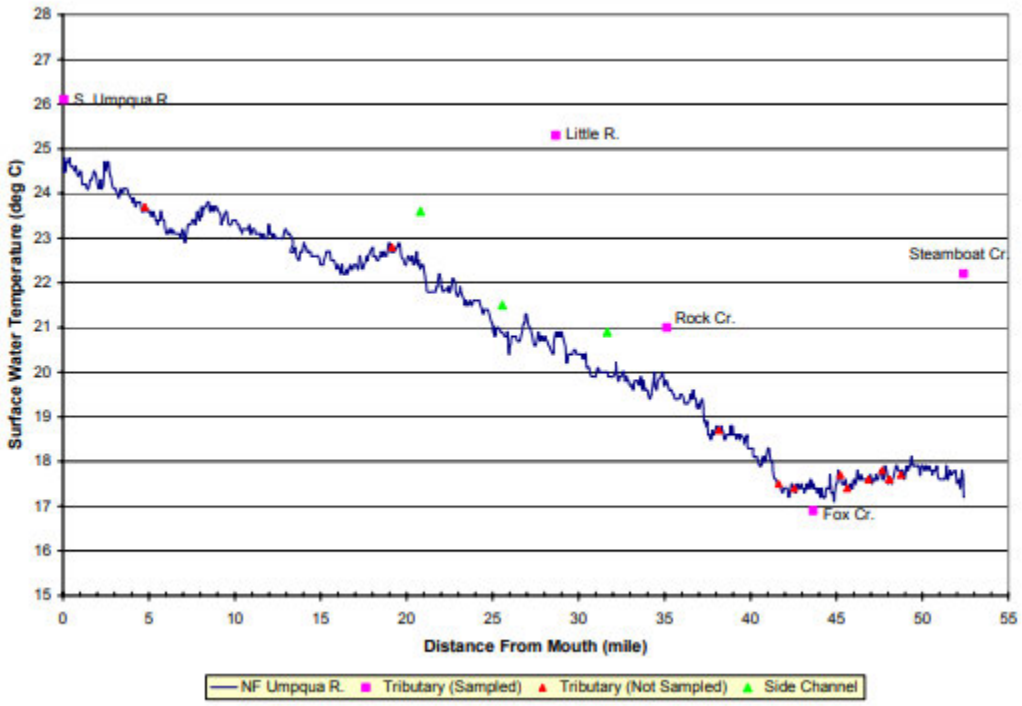
Without data, ODFW has no empirical reason to assign Winchester Dam a fish passage level of "3." It appears that this ranking is based on subjective opinions regarding "the barrier and history of fish passage at the site." Such subjective reasoning should not play a role in ODFW's revised priority list. Where ODFW lacks quantifiable data of fish passage impacts, as is the case with Winchester Dam, a value of "0" of N/A would be more appropriate. ODFW should revise its methodology accordingly.[1]

The revised priority list also fails to consider various factors that demonstrate the benefits of Winchester Dam. For instance, Winchester Dam has impeded the upstream migration on non-native, predatory smallmouth bass. Downstream of Winchester Dam, juvenile salmonids are heavily predated by bass. Upstream of Winchester Dam, smallmouth bass predation is nonexistent or negligible. This positive effect should lower Winchester Dam's priority ranking.

As the revised priority list emphasizes climate change, it should also take into account

[1] Where structures are *complete* passage barriers, or the effects of a barrier on passage have been quantified, ODFW should assign a passage level accordingly. However, where no data exists, ODFW should not arbitrarily assign a passage level based on subjective recommendations that may not be rooted in actual biological reasoning.

Winchester Dam's effect on stream temperatures. The best available evidence from Oregon's Department of Environmental Quality indicates that the temperature of the North Umpqua River *declines* by around one degree Celsius in the river reach at Winchester Dam. This is illustrated by the chart below, which depicts a steep decrease in surface water temperatures between river mile 5 and 10, at Winchester Dam:



Aerial Surveys in the Umpqua River Basin, May 2, 2003 at 30, https://www.oregon.gov/deq/FilterDocs/tmdlTIRump2003.pdf.

This improvement in stream temperatures driven by Winchester Dam's small reservoir should be noted in the revised priority list, dropping Winchester Dam down the list.

Given the above comments, and the analysis of senior fisheries scientist Ian Courter, provided as "Attachment 1" to these comments and incorporated herein, WWCD provides the following recommendations to improve the ranking methodology for the revised priority list:

1. Provide a sensitivity analysis for each metric;
2. Provide biological rationale for each metric;
3. Revise the approach to include empirical evidence in each component of the ranking equation;
4. Discard the arbitrary scalers used in the ranking equation;
5. Revise the "level of fish passage" metric for Winchester Dam to be 1, which is more appropriate given the definitions provided on page 5 of the Draft 2024 methods document and knowledge of passage conditions at Winchester Dam.

For the reasons provided herein, WWCD urges ODFW to revise its passage methodology and priority ranking, returning Winchester Dam to the ranking it held in 2013.

Sincerely,

DOMINIC M. CAROLLO
DMC/klh

Attachment 1

MOUNT HOOD ENVIRONMENTAL
Fisheries and Environmental Consulting

39085 Pioneer Blvd Suite 200 | Sandy, OR 97055
503-668-0033 | mthoodenvironmental.com

November 27, 2024

Carollo Law Group
2315 Old Hwy 99 S
Roseburg, OR 97471

Subject: Comments on Draft 2024 Fish Passage Barrier Priority List: Focus on Winchester Dam Ranking

Summary: Recommended revisions to ranking methodology and Passage Barrier Priority List:

1. Provide a sensitivity analysis for each metric
2. Provide biological rationale for each metric
3. Revise the approach to include empirical in each component of the ranking equation
4. Discard the arbitrary scalers used in the ranking equation
5. Revise the "level of fish passage" metric for Winchester Dam to be 1, which is more appropriate given the definitions provided on page 5 of the Draft 2024 methods document and knowledge of passage conditions at Winchester Dam

Dear Mr. Carollo,

Oregon's Fish Passage Priority List is primarily qualitative and heavily subjective in nature. While two quantitative metrics—habitat area and thermal stability—are included, the prioritization process is largely based on a subjective scoring system informed by qualitative indicators. Additionally, an undocumented scaling scheme is applied to each qualitative indicator, with arbitrary scaler multipliers. The rationale for assigning different levels of importance to these indicators is unclear, as the relative weights of proxy metrics seem to have been decided by committee. Biological reasoning and empirical data played a minimal role in the prioritization process for passage barriers.

In my view, the prioritization process is flawed because it attempts to generate quantitative rankings from qualitative assessments. Results of the ranking process are misleading because they imply objectivity and rigor when there is none. This approach is also inherently problematic, leading to situations where priorities shift over time due to public opinion or agency policy urgencies rather than objective, data-driven reasons. Notable examples include Bowman Dam and Winchester Dam. To improve this process, I believe ODFW's Fish Passage Task Force should adopt

quantitative methods grounded in watershed-specific data. For instance, habitat quality should be assessed using existing water quality and physical habitat attribute data, with habitat quality and quantity estimates tailored to each native migratory species impacted by the barriers.

With this context in mind, I will comment specifically on Winchester Dam. This barrier was not included in the 2007 Fish Passage Priority List. However, in 2013, the list was expanded, and the ranking methodology shifted from an entirely qualitative process to a quasi-quantitative system that relied on proxy metrics derived through qualitative reasoning. Winchester Dam was added to the expanded list in 2013 at position 126. In 2019, ODFW revised its methodology again, incorporating a ranking system that emphasized the product of stream habitat quantity and a subjective habitat quality score for conditions upstream of each barrier. Habitat quality scores were assigned by local district biologists. Using this updated method, the area upstream of Winchester Dam received a habitat quality score of 5 out of 7, leading to a relatively high overall score.

Furthermore, without explanation, the "level of fish passage" metric was changed from 1 to 3 in 2019. This was surprising because fish passage at Winchester Dam is not regarded as a limiting factor for migratory fish production in the North Umpqua River. Evidence for delay of migrating adult salmonids at Winchester Dam is lacking. Conversely, anecdotal observations by ODFW staff and empirical evidence from fish passage evaluations (ODFW 1985) indicate adult salmonids do not have difficulty finding the fish ladder entrances, and movement through the ladder is unincumbered.

Migrating juvenile salmonids typically pass over the top of the dam following the majority of flow, with a small number of fish passing downstream via the adult fish ladder. Approximately 75% of the dam's crest provides surface passage and, unlike large water storage and hydropower dams, water spills over Winchester Dam year-round. Studies in Columbia River tributaries have found that surface passage routes provide the highest survival probability for juvenile salmonids. In summary, it is my opinion that there is a lack of empirical data or anecdotal information supporting the hypothesis that Winchester Dam is a source of significant passage delay or injury to juvenile and adult salmonids.

Taken together, high habitat quality scores and level-of-passage scores assigned in 2019 moved Winchester Dam to 24 on the priority list. For the draft 2024 priority list, the methodology was revised again to include additional factors such as cold-water access and thermal stability upstream of each barrier. Under this new system, Winchester Dam rose to position 18, receiving a score of 0.5 for cold-water access and 0 for change in thermal stability. These scores reflect observed cool upstream temperatures and predicted stability of those temperatures in response to climate change. As with other metrics in the passage ranking equation, both temperature scores were multiplied by arbitrary scalers.

Sincerely,

Ian Courter
Senior Fisheries Scientist
Mount Hood Environmental
ian.courter@mthoodenvironmental.com

References

ODFW (Oregon Department of Fish and Wildlife). 1985. Evaluation of the impact of operation of the winchester hydroelectric project on salmonids of the North Umpqua River, Oregon. Fish Division, Oregon Department of Fish and Wildlife. Progress Report. 98pp.

From: [redacted]
To: NORDHOLM Katherine E * ODFW
Subject: Winchester Dam fish passage
Date: Monday, November 11, 2024 7:08:49 AM

> You don't often get email from [redacted]. Learn why this is important

I think the Winchester Dam on No. Fk. Umpqua River should be removed. Recent efforts to upgrade it lead to a significant loss of lamprey. The dam is so old that continual efforts to repair it will be necessary. The current location of the fish ladder is on the opposite side of the river than it should be. We now have good counts at Soda Springs Dam and at Big Bend Pool that could be used as indicators in case Winchester Dam and ladder are removed.

[redacted]

From: Allen, Chris
To: Fish Passage * ODFW
Cc:
Subject: USFWS comments on Statewide Fish Passage Barrier Priority List
Date: Wednesday, December 18, 2024 8:19:52 AM

To whom it may concern. Please accept these comments from the USFWS on ODFWs revised statewide fish passage barrier priority list. We apologize for submitting these comments past the November deadline for comments.

USFWS is providing these comments based on our review of the Willamette Valley Project, a project we are tracking closely. However, these comments likely apply to other passage barriers throughout Oregon.

1. Suggest factoring in for the priority ranking the number of native species that can no longer reach historical spawning habitats above each barrier, and thus have a restricted range/distribution:
    a. In the Willamette, for example, passage into the Middle Fork Willamette is of greater importance for bull trout than passage for bull trout above several other WVP dams that did not historically support bull trout spawning; At this time, the model does not distinguish between Spawning/Rearing habitats for bull trout vs. migratory/foraging habitats for bull trout.
    b. Pacific lamprey spawning habitats have also been greatly restricted due to lack of passage at USACE dams.
    c. It's not clear why some native species are listed in some areas but not other areas where they are or are likely to be. Some species are wide-ranging but not specified in the list of NMF. For example- western brook lamprey occur below Cougar dam, but are not listed. How does ODFW make decisions on what species are included in the list?
    d. Similarly- the number of species specified is not always reflected in the column O "#NMF"; Is this because some of the species are listed as "historical"? If they were there historically, and are not there today because of passage issues (but could be with passage fixes), we recommend those species are included in the NMF counts. However, there may also be some errors- e.g., Fall Creek Dam has 8 species named but NMF is only listed as 6; Clear Branch Dam has 7 named species but NMF is 6; similarly - Dexter Dam and Hills Creek Dam are both 1 short in # NMF compared to the number of species listed.
2. Suggest noting that Pacific lamprey are no longer present above all of the USACE WVP dam entries (e.g., "Pacific lamprey-historical"), with the possible exception of Fall Creek Dam, where in 2024 the USACE passed 12 adults (which is a record since Pacific lamprey were reintroduced over a decade ago). Thus- without additional efforts to pass lamprey

at Fall Creek Dam, the 7 year reintroduction program initiated by Confederated Tribes of the Grand Ronde and resulted in a large outmigration of Pacific lamprey juveniles will be essentially moot, and Pacific lamprey distribution above Fall Creek will once again become "historical".

3. Looking at the two factors that attempt to incorporate climate change and access to cool waters. It seems access to cooler waters will be increasingly important in light of climate change- however, these factors can only contribute a maximum of 30 points each (or 60 points total), which seems too low, given many of the scores are well over 500 points. How well does the model prioritize these critically important cool and colder water habitats? Should the maximum for 30 for both factors be increased?
4. For the "Hills Creek Dam" entry- both bull trout and spring chinook are trucked above this dam. The "number of threatened species" should be changed from "1" to "2".
5. For Lookout Point and Blue River dams- bull trout should be listed as "historical" .

6. For the Hood River Basin and Clear Branch Dam, currently, bull trout are the only federally listed fish above Clear Branch Dam. The other species occur below. Not sure if that affects the number of threatened species- which is listed as 4, but it seems the 3 NMFS listed species would be considered "historical". It seems quantifying the number of listed threatened species in this manner is inconsistent with other areas.

Chris Allen (he/him)

Aquatic Resources Division Manager
Oregon Fish and Wildlife Office
U.S. Fish & Wildlife Service, Region 1
Portland, Oregon

Public Comments Received Feb. 2025

Oregon
Tina Kotek, Governor

Department of Transportation
Environmental and Hydraulic
Engineering Section
4040 Fairview Industrial Dr. SE
Salem, OR 97302-1142
Phone: (503) 986-3459
Fax: (503) 986-3407

February 19, 2025

Katherine Nordholm
Oregon Department of Fish and Wildlife
Fish Screens and Passage Coordinator
4034 Fairview Industrial Dr. SE
Salem, OR 97302

Dear Katherine,

The Oregon Department of Transportation (ODOT) appreciates the opportunity to provide public comments on the development of the Oregon Department of Fish and Wildlife's (ODFW) draft 2025 Statewide Fish Passage Barrier Priority List. This list is central to the mission of the ODOT Fish Passage Program in delivering on our commitment to the Oregon Plan for Salmon and Watersheds. As you know, the ODOT Fish Passage Program uses this list to prioritize available program funding across the State Highway network, leverage other business lines within ODOT, pursue applicable Federal grant opportunities, and collaborate with Federal, State, Local, and Tribal partners.

As with our previous public comments on this effort, ODOT does not have any significant concerns or comments on the development of this proposed prioritization methodology. Based on the edits to the current draft list, it is apparent that additional coordination within the department has been made to correct inaccuracies previously included, and we appreciate the responsiveness of staff to address these errors where appropriate. We have a few remaining comments on specific ODOT owned locations, and they are attached for your review.

One recommendation on future priority list updates is to provide better statewide consistency regarding ODFW District staff scoring approaches. Specifically, it seems there are multiple inconsistencies with the use of Auto Up / Down functions, and how level of passage at these locations is scored across ODFW Districts. One District using Auto Up or Down functions constantly, while another District omits Auto scoring altogether, creates bias at a statewide scoring scale. Likewise, a District using Auto Up reasoning for "Large population of impacted fish" seems to be based on the individual opinion inputting scores, and is especially apparent reviewing the draft list across watersheds and populations. The result of these inconstancies is biasing barrier locations and directing limited resources to projects that may ultimately not be the most urgent need for our states Native Migratory Fish species.

In future priority list updates, additional statewide staff trainings or guidance materials may help with reducing these inconstancies, and result in a biologically based statewide priority list. We are making the assumption that this inconsistency on ODOT owned barriers is also apparent on barriers owned by others, and spread throughout the statewide priority barrier list. Providing staff with existing examples of when Auto Up / Down are appropriately used, and an overview of life history-based passage level scoring, can better guide Districts to be consistent in assigning weights to these priority locations.

Again, ODOT expresses its gratitude for your work and development of this important list. Please do not hesitate to reach out if we can provide more clarity or discussion into any of these comments.

Best,
Allen

Allen Gillette
Aquatic Biology and Fish Passage Program Coordinator
ODOT Environmental and Hydraulic Engineering Section
4040 Fairview Industrial Dr. Se
Salem, OR 97302
Office: (503) 986-3459

Oregon Department of Transportation Comments on ODFW Draft 2025 Statewide High Priority Barrier List				
Subbasin (HUC8)	**ODFW Barrier ID**	**Barrier Name**	**Stream Name**	**Comment**
Sixes	3951	Unnamed Culvert	Boulder Creek	Please confirm Auto Down score applicability with multiple AOs (dams) documented downstream in ODFW Barrier database. Other ODOT owned locations have Auto Downs applied for situations where only two upstream barriers are present.
Wilson-Trask-Nestucca	4553	Unnamed Culvert	Killiam Creek	Please confirm passage level of "3". During periods of migration, this structure seems to be a significant barrier to adults, and a full barrier to juveniles and Pacific lamprey. A "4" seems more appropriate for current passage barrier score.
Chetco	5483	Unnamed Culvert	Whalehead Creek	Please confirm passage level of "4". Three culverts are available at different elevations, allowing for variable velocity, backwater, and adult salmonid migration during various flow and tidal levels. A "2" or "3" level of passage seems more appropriate for this location. Please confirm Auto Up Score and associated reason (large population) apply at this location.
Umpqua	5774	Unnamed Culvert	Bogus Creek	Please confirm Auto Down applicability for this location. Other ODOT Owned barriers are not receiving an Auto down score despite multiple upstream and downstream barriers.
NWWD-Coast Range Unit	7381	Unnamed Culvert	Tryon Creek	Please confirm Auto Down score applicability with multiple AOs (22) documented upstream in ODFW Barrier database. Other ODOT owned locations have Auto Downs applied for situations where only two upstream barriers are present
Nehalem	7688	Unnamed Culvert	Knickerson Creek	Please confirm Psg. Level of "4" for this location, as ODFW barrier database includes "Completely passable" under fpbFPasSta. In addition, Recent site visits allude to volitional passage during low / moderate flow for all species and life stages present in system. Recommend this location is a "2" or "3" level barrier based on life history impacts during flows associated with periods of migration.
Klamath	9318	Unnamed Culvert	Moss Creek	Please confirm Psg. Level of "3" used in equation, as ODFW Barrier database includes "Completely passable" under fpbFPasSta.
Lower Willamette	11766	Kellogg Dam	Kellogg Creek	Please confirm Auto Down score applicability with multiple (12+) AOs documented upstream in ODFW Barrier database. Other ODOT owned locations have Auto Downs applied for situations where only two upstream barriers are present.
Lower Willamette	13085	Unnamed Culvert	Crabapple creek	Please confirm anadromous species listed can currently access this location through downstream infrastructure and barriers. Please confirm Auto Up Score and associated reason (large population) apply at this location.

Oregon Department of Transportation Comments on ODFW Draft 2025 Statewide High Priority Barrier List				
Subbasin (HUC8)	**ODFW Barrier ID**	**Barrier Name**	**Stream Name**	**Comment**
South Umpqua	14541	Unnamed Culvert	Canyon Creek	Please confirm Psg. level of "3", as this location may not provide any passage for any species life stages present in Canyon Creek. Please confirm habitat quality and stream temperature scoring due to recent severe fires in watershed.
North Umpqua	15632	Unnamed Culvert	Fairview Creek	Please confirm Subbasin (HUC8) location in "Auto Up Reason" document.
Lower Columbia-Clatskanie	33563	Unnamed Culvert	Merrill Creek	Please confirm structure type. A degraded fish ladder is located downstream, separate and unassociated with the highway crossing, and is a significant barrier.

Protecting Natural Flows in Oregon Rivers

WATERWATCH

February 28, 2025

ODFW Fish Passage Program
Oregon Department of Fish & Wildlife
4034 Fairview Industrial Dr SE
Salem, OR 97302

Sent Via Email

Re: Comments of WaterWatch of Oregon on Updated Draft 2025 Statewide Priority Fish Passage Barrier List

ODFW Fish Passage Task Force:

Thank you for the opportunity to comment regarding ODFW's Statewide Fish Passage Barrier Prioritization List update. These comments are specific to Barrier # 32764, Unnamed Wier on Pine Hollow Creek, in the John Day River Basin. This barrier is listed in Group 1 of the ODFW 2019 Statewide Fish Passage Barrier Priority List for impeding passage to 36.5 miles of habitat for summer steelhead, redband trout, and other native migratory fish. However, this barrier does not appear on any draft versions of the 2025 update.

WaterWatch is not aware of any reason for this barrier to be removed from ODFW's 2025 list.

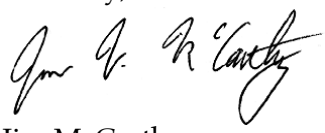
These comments incorporate by reference the emails and images I sent to ODFW fish passage staff on January 13 and 14, 2025 in response to the apparent accidental omission of this barrier on the draft 2025 list. As noted in these emails, I have visited this barrier location in person. It is a partially buried natural gas pipeline topped with boulder rip-rap which runs entirely across a stretch of braided creek channel on BLM-managed lands a short distance upstream from the confluence of Pine Hollow Creek and the John Day River. Because the pipeline is only partially buried, it creates a continuous berm of boulders spanning the entire creek. The large size and irregularity of this stream spanning rip-rap berm likely presents risk of injury, entrainment, and death to native migratory fish attempting to navigate the tight and twisting spaces between boulders, in addition to stopping or delaying their migration, particularly during lower flows.

The pipeline forming this barrier is part of the Gas Transmission Northwest (GTN) pipeline owned and operated by the TC Energy.

WaterWatch urges ODFW to include Barrier # 32764 in the final 2025 update of the Statewide Fish Passage Barrier Prioritization List.

Thank you again for the opportunity to comment.

Sincerely,



Jim McCarthy
Southern Oregon Program Director
WaterWatch of Oregon

From:	Jim McCarthy
To:	APKE Greg D * ODFW; NORDHOLM Katherine E * ODFW
Subject:	Fw: Pine hollow barrier from below
Date:	Monday, January 13, 2025 2:29:54 PM
Attachments:	IMG_1370.jpg IMG_1371.jpg

Hey Greg,

Here is the barrier I wasn't able to find on the new draft barrier priority list. Maybe I missed it? It's in John day basin, across from thirty mile boat access on BLM lands.

Thanks,

Jim

From: Jim McCarthy <jim@waterwatch.org>
Sent: Tuesday, June 21, 2022 10:59 AM
To: RITCHEY Alan D ODFW <Alan.D.RITCHEY@odfw.oregon.gov>
Subject: Pine hollow barrier from below

Looking upstream in main creek channel

—
Jim McCarthy
Southern Oregon Program Director | WaterWatch of Oregon
541-708-0048
PO Box 261
Ashland, OR 97520
www.waterwatch.org

Join WaterWatch to Protect and Restore Oregon's Rivers

NORDHOLM Katherine E * ODFW

From: Jim McCarthy <jim@waterwatch.org>
Sent: Tuesday, January 14, 2025 2:20 PM
To: APKE Greg D * ODFW; NORDHOLM Katherine E * ODFW
Subject: Fw: Pine hollow barrier from above
Attachments: IMG_1373.jpg

From: Jim McCarthy <jim@waterwatch.org>
Sent: Tuesday, June 21, 2022 11:01 AM
To: RITCHEY Alan D ODFW
Subject: Pine hollow barrier from above

Creek is running right to left in attached

—
Jim McCarthy
Southern Oregon Program Director | WaterWatch of Oregon
541-708-0048
PO Box 261
Ashland, OR 97520
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.waterwatch.org%2F&data=05%7C02%7CKatherine.E.NORDHOLM%40odfw.oregon.gov%7C9ce29c6e2d3d4f65cdf808dd34e99667%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638724900097058398%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=h%2FIo5Vu9JgY0Qen96BnsUFoeAEs%2B1EafTRdCBlc%2Ft%2FM%3D&reserved=0

Join WaterWatch to Protect and Restore Oregon’s Rivers

NORDHOLM Katherine E * ODFW

From: Jim McCarthy <jim@waterwatch.org>
Sent: Tuesday, January 14, 2025 2:21 PM
To: APKE Greg D * ODFW; NORDHOLM Katherine E * ODFW
Subject: Fw: Pine hollow north side channel
Attachments: IMG_1376.jpg

From: Jim McCarthy <jim@waterwatch.org>
Sent: Tuesday, June 21, 2022 11:05 AM
To: RITCHEY Alan D ODFW
Subject: Pine hollow north side channel

One of the creek side channels crossed by the pipeline. There was no flow in this channel on Thursday but this channel would appear to carry flow during the wet season.

—
Jim McCarthy
Southern Oregon Program Director | WaterWatch of Oregon
541-708-0048
PO Box 261
Ashland, OR 97520
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.waterwatch.org%2F&data=05%7C02%7CKatherine.E.NORDHOLM%40odfw.oregon.gov%7C9230a541303744bfa3c908dd34e9a994%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638724900421341283%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=VLdfq%2BrbTTVLki%2Fh0bb95x2qCO1tCBW%2FBO9Yy0NyLfs%3D&reserved=0

Join WaterWatch to Protect and Restore Oregon’s Rivers

NORDHOLM Katherine E * ODFW

From: Jim McCarthy <jim@waterwatch.org>
Sent: Tuesday, January 14, 2025 2:21 PM
To: APKE Greg D * ODFW
Cc: NORDHOLM Katherine E * ODFW
Subject: Fw: Pine hollow creek upstream
Attachments: IMG_1379.jpg; IMG_1382.jpg

From: Jim McCarthy <jim@waterwatch.org>
Sent: Tuesday, June 21, 2022 11:07 AM
To: RITCHEY Alan D ODFW
Subject: Pine hollow creek upstream

Images of main creek channel just upstream of the barrier.

—
Jim McCarthy
Southern Oregon Program Director | WaterWatch of Oregon
541-708-0048
PO Box 261
Ashland, OR 97520
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.waterwatch.org%2F&data=05%7C02%7CKatherine.E.NORDHOLM%40odfw.oregon.gov%7C9cf59af461ba419d43cd08dd34e9bac6%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638724900746537510%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=z3L%2BU2hl4nOqZfH0VMs8WLf1%2FscK4I21G6S6mttMGO0%3D&reserved=0

Join WaterWatch to Protect and Restore Oregon’s Rivers

NORTH CLACKAMAS WATERSHEDS COUNCIL

2416 SE Lake Road, Milwaukie, OR 97222 - 503-550-9282 – northclackamaswatersheds.org

February 26, 2025

To: Fish Passage Task Force Fish.Passage@ODFW.Oregon.Gov
Greg Apke, Statewide Fish Passage Program Leader
Ben Walczak, District Biologist
Steve Niemela, North Willamette Watershed District Manager
Dave Stewart, Stream Restoration Biologist

CC: Dave Stewart, Stream Restoration Biologist
Jim Brick, Lower Columbia Implementation Coordinator
Kregg Smith, Senior Policy Analyst
Mary Wahl, Oregon Fish and Wildlife Commission Chair
Becky Hatfield-Hyde, Oregon Fish and Wildlife Commission Vice-Chair
Dr. Leslie King, Oregon Fish and Wildlife Commissioner
Bob Spelbrink, Oregon Fish and Wildlife Commissioner
Mark Labhart, Oregon Fish and Wildlife Commissioner
Dallas Hall Defrees, Oregon Fish and Wildlife Commissioner
Amy Horstman, National Fish Passage Program, US Fish & Wildlife Service
Greg Robertson, Pacific Northwest Fish Passage Program, US Fish & Wildlife Service
Megan Callahan Grant, NOAA Fisheries
Lauren Senkyr, NOAA Fisheries
Mischa Conine, NOAA Fisheries

RE: Comments on Draft Statewide Fish Passage Barrier Prioritization List

The North Clackamas Watersheds Council is pleased to submit its comments to the Oregon Department of Fish and Wildlife regarding the Draft Priority Fish Passage Barrier List.

The North Clackamas Watershed Council, in partnership with ODFW and other state and local partners, have completed both the North Clackamas Watershed Action Plan (NCWC, 2022), the North Clackamas Watersheds Temperature Study (NCWC, 2023), and the Assessment of Potential Barriers to Fish Passage in North Clackamas Watershed Council Area Streams (NCWC, 2023). By combining this information with patterns of fish use determined through eDNA studies, combined with our existing work to achieve fish passage and habitat restoration at Kellogg Dam, we are able to put forward strong priorities for fish passage. These studies have identified several priority fish passage barriers that pose both threats to

native fish and opportunities for habitat access that capitalize on existing cold water, particularly at creek confluences with the Lower Willamette River where these channels provide both rearing and migratory habitat and cold water refugia for both LCR and Upper Willamette salmonid and lamprey populations. All of these barriers have habitat restoration projects and fish passage projects associated with them.

Several of these barriers are not listed in the current Draft Priority Barrier List, despite significant impacts on native fish populations. We urge ODFW staff and the Fish and Wildlife Commission to incorporate them as priority barriers.

Kellogg Dam (Barrier #11766)

Location:	Kellogg Creek/Willamette Confluence in Milwaukie, OR
Coordinates:	45.441773, -122.641902
Passage:	Near-total barrier
Ownership:	ODOT
Ecological Uplift:	Create volitional fish passage for all stocks rearing and migrating through the Lower Willamette, complete floodplain habitat restoration upstream of dam, capitalize on summer cold water at confluence, and leverage existing restoration efforts.

We support retaining Kellogg Dam at the utmost priority and believe its priority should be higher given the window of opportunity. This project, in final design, has secured $27M from regional and federal sources and are seeking final construction funding partnered with ODOT, American Rivers, and the City of Milwaukie and was awarded a $15M grant from NOAA Fisheries to fully design the project to restore volitional fish passage to 17 miles of cold-water refugia and restore the lower Kellogg Creek floodplain through the 14-acre dam impoundment. EDNA studies referenced above confirm that on the few days a year when Kellogg Dam is passable salmonids use the entire Kellogg-Mt. Scott Watershed.

Placing this barrier as a higher priority on the Prioritization List will be a vital step in securing federal, private, and state construction funding and driving the project to completion. Because the project has so many additional benefits, including earthquake resilient infrastructure, economic development, and traffic safety, it is eligible for funds from multiple pathways.

Thiessen Road, Kellogg Creek (Barrier #51934)

Location:	Kellogg Creek at Thiessen Road crossing
Coordinates:	45.416177, -122.599253
Passage:	Partial barrier
Ownership:	Clackamas County
Ecological Uplift:	Leverage existing restoration efforts upstream at Parmenter Ponds and existing culvert replacement CIP

Kellogg Creek flows under Thiessen Road through an undersized culvert causing the creek to back up and flood the road and upstream properties, as well as creating a hydraulic passage barrier for fish during certain flows. This culvert is just upstream of significant habitat restoration work underway at Parmenter Ponds through NCWC's Streamside Stewards

program; both temperature and eDNA studies show that Parmenter Ponds are vital cold water refugia I summer. We thank ODFW for including of this culvert as a fish passage priority.

However, we are concerned that the following barriers, which we submitted to ODFW in July 2023, are not included in the Draft Priority Fish Passage Barrier List. They are critical barriers in our watersheds and tied to planned restoration projects. We are not clear on why they are not included. We request that ODFW to include them.

Dean Creek @ Confluence with Mt. Scott Creek

Location:	Dean Creek at its confluence with Mt. Scott Creek
Coordinates:	45.4268, -122.5805
Passage:	Partial barrier
Ownership:	Union Pacific Railroad
ODFW Status:	Not listed in Draft Prioritized Fish Passage Barrier List
Ecological Uplift:	Access to cold water refugia in Dean Creek for chinook, coho, steelhead, and resident rainbow & cutthroat trout; adjacent to floodplain reconnection at 3 Creeks Protected Area

Dean Creek has been identified as a source of significant cold water during summer, and access to this creek will provide a critical summer refugia for rearing fish (NCWC, 2023). The two corrugated metal pipes at the mouth of Dean Creek are very small diameter, with one being partially filled with substrate. They also appear to be crushed or potentially failing in the middle. This restricts passage for fish during many flow conditions, with water shooting through during high flows with enough energy to create a velocity barrier. This barrier is adjacent to the 3 Creeks Protected Area Floodplain Reconnection Project (construction 2025) which increases the value of fixing this barrier. This culvert is particularly important because we have documented reliable cold water in this creek in the summer, creating the potential for Dean Creek to be used as cold water refugia. As you can see by the photo below, this culvert is adjacent to the UP railway but is technically in a Clackamas County ROW (approximate location 45.4268, -122.5805). Species potentially using this area include chinook, coho, steelhead, and resident rainbow & cutthroat trout (as supported by our eDNA work). Available habitat upstream us 5290 ft (so about 1 mile) based on GIS measurements.

River Forest Creek at River Forest Drive

Location:	River Forest Creek just upstream of Willamette Confluence
Coordinates:	45.41574773, -122.6543307
Passage:	Total barrier
Ownership:	Clackamas County
ODFW Status:	Not listed in Draft Prioritized Fish Passage Barrier List
Ecological Uplift:	Create volitional fish passage for all stocks rearing and migrating through the Lower Willamette, hydraulically disconnect the creek from the adjacent lake to remove the temperature hazard and leverage recent restoration downstream of culvert.

These culverts are a complete barrier to fish passage and consist of two stacked corrugated pipes on top of a concrete vault that are activated at different flow levels (location 45.415748, -122.654331). They are immediately upstream from the Willamette River – River Forest Creek Confluence, where our Watershed Council conducted a major habitat improvement project in 2024. These culverts are owned by Clackamas County. SE River Forest Drive essentially impounds River Forest Lake, a lake that significantly impacts water temperatures in River Forest Creek (as shown by our temperature study). A combination of barrier removal and potential hydraulic isolation of the River Forest Creek stream channel from the lake would combine to create unrestricted access into the watershed where cold water refugia exists. Approximately 6100 feet (1.2 miles) upstream would be opened up. Species potentially using this area include chinook, coho, steelhead, and resident rainbow & cutthroat trout. This project has been identified as a need by the Watersheds Council in its Rapid Bioassessment (2020) and draft Watershed Action Plan (2022).

Walta Vista & River Road Culverts, Lower Boardman Creek

Location:	Boardman Creek just upstream of Willamette Confluence
Coordinates:	45.398404, -122.630611(River Road) and the second culvert running under SE Walta Vista Drive (45.398185, -122.630782).
Passage:	Total barrier
Ownership:	Clackamas County
ODFW Status:	Not listed in Draft Prioritized Fish Passage Barrier List
Ecological Uplift:	Create volitional fish passage for all stocks rearing and migrating through the Lower Willamette, capitalize on summer cold water at confluence, and leverage existing restoration efforts downstream of culvert.

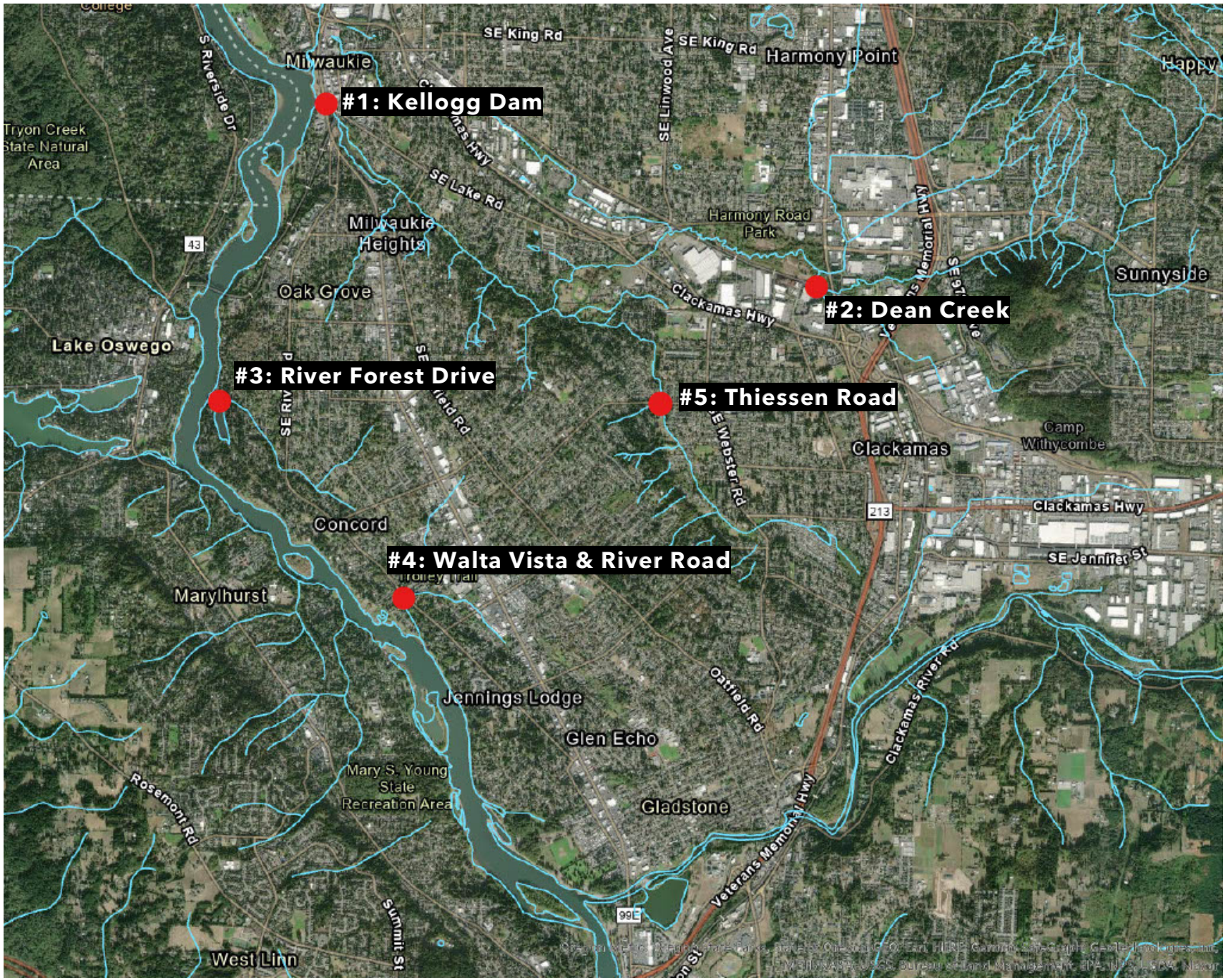
Boardman Creek passes through two completely impassable corrugated metal pipe culverts underneath SE Walta Vista and River Road. This is a key area between the Boardman/Willamette Confluence, where we are designing a habitat restoration project and habitat restoration conducted upstream at Boardman Wetlands. The culverts are owned by Clackamas County, with the daylighting section of the project being on private property. A concept level design has existed for this project since 2013, that would replace these culverts with bridges, daylight 520 feet of stream between the culverts, and open 6000 feet of fish passage to McLoughlin Blvd, including 3000 feet of high quality habitat between River Road and Stringfield Park. Species potentially using this area include chinook, coho, steelhead, and resident rainbow & cutthroat trout. We know from our temperature study that lower Boardman Creek can function as cold water refugia from the Willamette in the summer. I will also add, this project has been as identified as a need by both the Watersheds Council in its Rapid Bioassessment (2020) and draft Watershed Action Plan (2022) and by Oak Lodge Water Services in its Boardman Watershed Initiative (2013) and Clackamas County (2013) leading to the TS&L Report. Clackamas County and the Watershed Council have previously sought funding for addressing this barrier and will again; its absence from the Priority Barrier List is an impediment to securing this funding.

We ask that these important barriers be identified and prioritized by ODFW on the Priority Fish Passage Barrier List.

Thank you for your work to restore fish habitat and your partnership with the Council. The fish, wildlife, and people of Oregon are directly benefitting from these efforts.

Sincerely,

Neil Schulman
Executive Director


#1: Kellogg Dam
#2: Dean Creek
#3: River Forest Drive
#4: Walta Vista & River Road
#5: Thiessen Road
Milwaukie
Harmony Point
Happy
Tryon Creek State Natural Area
S Riverside Dr
SE King Rd
SE Linwood Ave
SE Lake Rd
Milwaukie Heights
Harmony Road Park
Sunnyside
Oak Grove
Clackamas Hwy
Lake Oswego
SE Webster Rd
Clackamas
Camp Withycombe
Concord
213
SE Jennifer St
Marylhurst
Jennings Lodge
Oatfield Rd
Clackamas River Rd
Glen Echo
Mary S. Young State Recreation Area
Gladstone
Rosemont Rd
Veterans Memorial Hwy
99E
Summit St
West Linn

From: Brandon Culley
To: Fish Passage * ODFW
Subject: Public Comment updated statewide Priority Fish Passage Barrier List.
Date: Sunday, March 2, 2025 8:04:11 AM

To ODFW Fish Passage Task Force,

Encouraged to see that all three Hells Canyon Complex Hydro facilities finally made the priority list in 2024, since Oxbow was left out in 2019. Still confused as to how Brownlee Dam which is the furtherest upstream is in the top 10, but Hells Canton Dam which is where anadromous fish runs stop is in group 1. The list should be prioritized based on the lack of fish ladders on hells canyon, oxbow, and brownlee.

Additionally this complex of dams blocks more historical habitat for more T and E species, than Detroit and Lookout Point Dam combined..which are currently the top 2.

The score for cold water access for Brownlee is wrong… Rivers such as the Burnt River, Payette, Weiser, Boise, Malheur, Powder River, and multiple tributaries associated with these historical habitats should be reflected as a 1.

Brandon Culley
Concerned and Frustrated Oregon Salmon and Steelhead Fisherman