

September 5, 2023

Hayley Hamann
Gresham Planning Commission
Via email at Hayley.hamann@greshamoregon.gov



RE: Wetlands and Fish Passage, Veranda at Pleasant Valley Master Plan and Subdivision

Dear Ms. Hamann,

I am submitting this letter in response to the 05/23/2023 letter from AKS Engineering that addressed plans for the proposed project, "Veranda at Pleasant Valley Master Plan and Subdivision."

For the past eight years, I have been the Executive Director of the Johnson Creek Watershed Council, planning and constructing restoration projects, including working in Kelley Creek and its tributary, Mitchell Creek. We removed one dam removal on Kelley Creek and addressed three other fish passage barriers on Mitchell.

I have worked for 28 years in the field of watershed restoration, focusing on fish passage, fish habitat enhancement, conserved water programs and aquatic monitoring. My academic training is in hydrology and physics.

I'd like to offer a few comments on the AKS letter from my experience working in Kelley Creek.

The ODF&W online fish passage database is out of date. It lists as barriers several locations that are no longer barriers due to restoration by the Council. In particular, the letter mentions a barrier at the property 18124 SE Richey Road. This former barrier was an inline pond that the Council removed in 2007. The ODF&W database appears to have been created in the early 2000s and not updated.

Our Council also removed the most downstream full fish passage barrier, which was also an inline pond, in 2020. This one was located at 16600 SE Foster Road.

To my knowledge, there are currently three fish passage barriers on Kelley Creek at or downstream of SE 190th. The most upstream of these is a culvert under SE 190th St, owned by Multnomah County. Our surveys rated this as 0% passable (i.e. an impassible barrier).

The next downstream barrier is on a private road approximately 747 ft west of 190th St. When we surveyed this barrier in 2013, we rated it 0% passable primarily because of debris blockage. This is not an intrinsic barrier, but rather one that could easily be fixed by maintenance. There are three concrete culverts together here that convey flow. It's not clear if this area has been cleared or maintained in the past ten years and is possible that the current beaver dam at that location may have impacted passability positively or negatively.

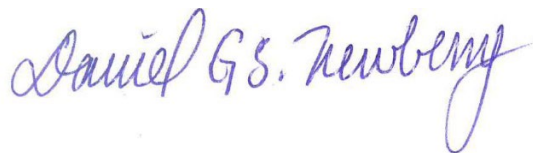
The third barrier is a Multnomah County culvert under Richey Road. Our surveys gave this a passability rating of 33%. When I last saw this culvert in 2019, it too was backed up, apparently by beavers, so it is difficult to know how much of the passability is intrinsic or a maintenance issue. Some of the survey data is incomplete here.

One reason our Council has focused significant energy toward removing fish passage barriers on Kelley Creek and its tributary, Mitchell Creek, is because these provide natural cold water habitat, compared to the mainstem Johnson Creek. As water and air temperatures continue to rise regionally and globally, lowering stream temperatures is critical to salmon survival. The Council's cold-water restoration strategy includes opening cold water habitat to salmonids and removing inline ponds. These are both strategies we have used on Mitchell and Kelley Creek.

For three years, the Council has conducted environmental DNA testing throughout the watershed as a method of detecting the presence of several fish species upstream of our fish passage restoration sites, and at other locations. Since we removed the dam on Kelley Creek at 16600 SE Foster Road in 2020, we have detected coho salmon multiple times and Pacific lamprey once at that location. We do not have any other testing sites further upstream on Kelley Creek. This is evidence that the ESA-listed coho salmon currently occupy Kelley Creek.

Regarding wetland functions and values, I would like to make several points. First, wetlands usually function to lower water temperature because most of the water flows subsurface in the majority of wetlands. When a wetland is dredged, or in other ways disturbed, what was formerly groundwater often becomes surface water, elevating the temperature. Second, the proposed Veranda site is in an area with a significant rise in topography nearby. It is often the case in such topographical settings that deeper, colder groundwater is forced to the surface near the stream. I encourage you to consider the potential impacts of disturbing the wetlands near Kelley Creek on the creek's water temperature as you make your decision.

Sincerely,



Daniel Newberry, Executive Director
Johnson Creek Watershed Council