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March 22nd, 2021

Richard Periman, Forest Supervisor
Mt. Hood National Forest
70220 E Highway 26
Zigzag, OR 97049

RE: Wild and Scenic River Management Plan for Nine Wild and Scenic Rivers

Dear Forest Supervisor Periman:

I am writing on behalf of American Whitewater to provide comment on the Draft Comprehensive River Management Plan for Nine Wild and Scenic Rivers and the associated Environmental Assessment.

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954 with approximately 50,000 supporters, 6,000 dues-paying members, and 100 local-based affiliate clubs, representing whitewater enthusiasts across the nation. American Whitewater's mission is to protect and restore America's whitewater rivers and to enhance opportunities to enjoy them safely. The organization is the primary advocate for the preservation and protection of whitewater rivers throughout the United States, and connects the interests of human-powered recreational river users with ecological and science-based data to achieve the goals within its mission. Our vision is that our nation's remaining wild and free-flowing rivers stay that way, our developed rivers are restored to function and flourish, that the public has access to rivers for recreation, and that river enthusiasts are active and effective river advocates. A significant percentage of American Whitewater members live in Oregon or travel to the region for the recreational opportunities the rivers in this Comprehensive River Management Plan provide. Our interest in these rivers extends beyond their recreational value however and includes the other identified river values of geology, fisheries, botany, wildlife, historic, and macroinvertebrate. In addition, we are proponents of maintaining the free flow character of these rivers and protecting their water quality.

Background

In 2009, nine rivers primarily on the Mt. Hood National Forest were designated as additions to the National Wild and Scenic Rivers System under Title I, Subtitle C, Section 1203 of the

Omnibus Public Land Management Act of 2009 (Public Law 111-11, 123 Stat. 991). The designated rivers include 81 miles of wild and scenic rivers across the Mt. Hood National Forest on the Barlow, Hood River, Clackamas, and Zigzag Ranger Districts, and on a portion of lands managed by the Northwest Oregon District of the Bureau of Land Management. American Whitewater directly supported and engaged in advocacy for the Omnibus Public Land Management Act of 2009. Our organization, along with our individual members, strongly supported the designation of these rivers.

Comments

We write in support and appreciation for a Comprehensive River Management Plan that appropriately considers all nine rivers. While the development of the Comprehensive River Management Plan did not occur within three years of designation,¹ we appreciate that it was completed prior to revision of the Forest Plan for the Mt. Hood National Forest.

The Comprehensive River Management Plan includes our input on river values, specifically inclusion of recreation and geology as an Outstandingly Remarkable Value for the Collawash, recreation as an Outstandingly Remarkable Value for the East Fork Hood, and the reference to paddling in the Outstandingly Remarkable Value for Eagle Creek. We are particularly pleased to see language that recognizes the unique value of the Collawash River due its challenge and remoteness,² the recognition of paddling as wilderness-compliant activity on Eagle Creek,³ identification of the unique attributes of the East Fork Hood River valued by whitewater paddlers that include its sustained gradient and continuous boulder features,⁴ recognition of paddling as among the activities enjoyed on Fifteenmile Creek,⁵ and recognition of whitewater paddling opportunities on Fish Creek.⁶ While recreation is not recognized as an Outstandingly Remarkable Value for the South Fork Clackamas River, our members have used kayaks to experience the scenery and historic values.

We strongly support language recognizing the need for the Oregon Department of Transportation to coordinate with the Forest Service on road repairs for Highway 35 along the East Fork Hood River.⁷ Like all users of the highway, whitewater kayakers depend on the route for access to the river and transportation through the corridor, but too often in the past

¹ 16 USC § 1273(d)(1)

² At Page 14, Draft Comprehensive River Management Plan for Nine Wild and Scenic Rivers, Mt. Hood National Forest, USDA Forest Service, (February 2021).

³ At Page 18, Ibid.

⁴ At Page 22-23, Ibid.

⁵ At Page 28, Ibid.

⁶ At Page 32, Ibid.

⁷ At Page 64-66, Ibid.

highway projects have resulted in impacts to the waterway creating safety hazards for river users that could have been avoided with better up-front communication and coordination.

The language on Tribal Governments notes that project-specific consultation was invited but it is unclear if the consulted tribes responded or provided specific feedback in the development of the Comprehensive River Management Plan.⁸ We recommend specific language to further document the nature of consultation.

We appreciate recognition of the fact that the local community includes many expert and professional adventure athletes; these individuals live and work in Oregon due to the access and opportunities these rivers provide. We agree that among the most important attributes of all the rivers in the Comprehensive River Management Plan, “they provide opportunities for challenge and self-reliance, supporting innovative and emerging recreation uses.”⁹

Appendix F includes the Management Direction from the Forest Plan and the statement that use of motorized watercraft “may occur within recreational segments.”¹⁰ This is reiterated in the Environmental Assessment that desired conditions for recreational segments may include motorized boats.¹¹ We question whether motorized watercraft are appropriate for the segments considered in this Comprehensive River Management Plan. The fact that a use may be permissible in the Forest Plan should not preclude the Forest from determining that use is inappropriate for the subset of rivers considered here. Section 10a of the Wild and Scenic Rivers Act establishes that each river “shall be administered in such manner as to protect and enhance the values which caused it to be included.”¹² Allowing motorized watercraft on the segments of the Collawash, East Fork Hood River, or Fish Creek classified as recreational is incompatible with values identified for these rivers.

We believe the steps outlined in Appendix G to determine user capacity estimates along with indicators, triggers, and thresholds is appropriate and appreciate the approach to establish a monitoring and adaptive management approach.

One notable omission from the Comprehensive River Management Plan is a discussion of wildfire, an element that shapes many of the Outstandingly Remarkable Values along these rivers. We acknowledge that events of the past year, including direct impacts to rivers considered here, have heightened our awareness of this issue. We believe the Comprehensive

⁸ At Page 88, Ibid.

⁹ At Page 110. Appendix C, Ibid.

¹⁰ At page 133, Appendix F, Ibid.

¹¹ At Page 6, Wild and Scenic River Comprehensive River Management Plan for Nine Wild and Scenic Rivers Environmental Assessment, Mt. Hood National Forest, USDA Forest Service, (February 2021).

¹² 16 USC § 1281(a)

River Management Plans for Wild and Scenic Rivers in the region should better take this into account and address the occurrence of wildfire, its management (including suppression), and its effects so that river values are protected before, during, and after a fire. The Comprehensive River Management Plan should include specific information about Outstandingly Remarkable Values, sensitive areas, and other at-risk values and prepare this information for entry into the Wildland Fire Decision Support System (WFDSS) as one means toward protecting river values during wildfire response. The Comprehensive River Management Plan should acknowledge that fire is a natural ecosystem process that periodically affects the rivers and their surrounding environment as part of a dynamic system and that it is within this larger context that people know, use, and enjoy the rivers that are, in part, shaped by fire.

Conclusion

Thank you for the opportunity to provide comment on the Wild and Scenic River Management Plan for Nine Wild and Scenic Rivers on the Mt. Hood National Forest. We support the planning direction contained within the Comprehensive River Management Plan for river values of recreation, geology, fisheries, botany, wildlife, historic, and macroinvertebrate as well as the free flow and water quality of these rivers.

Sincerely,

A handwritten signature in black ink, appearing to read 'tho keefe', with a long horizontal stroke extending to the right.

Thomas O'Keefe, PhD
Pacific Northwest Stewardship Director