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First name: Clinton

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Organization: American Whitewater

Title: Executive Director

Comments: Dear Acting Willamette Forest Supervisor Duane Bishop,
American Whitewater submits these comments on the Dead Mountain Environmental Assessment (Project #301815, Middle Fork Ranger District, Willamette National Forest) during the objection and comment period.

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954 with approximately 70,000 supporters, 7,000 dues-paying members, and 80 local affiliate clubs representing whitewater enthusiasts across the nation. Our mission is to protect and restore America's whitewater rivers and to enhance opportunities to enjoy them safely. We are the primary advocate for the preservation and protection of whitewater rivers throughout the United States, connecting the interests of human-powered recreational river users with ecological and science-based data to achieve the goals of our mission.

We write in support of the project's core goals: improving the health and resilience of overstocked riparian and upland stands, reducing wildfire risk, restoring Aquatic Conservation Strategy objectives, and enhancing trail connectivity within the Salmon Creek Corridor. These are worthwhile investments in a landscape the outdoor recreation community cares deeply about. We offer the following comments in the spirit of ensuring project implementation fully reflects the range of public values Salmon Creek provides.

The EA describes the Salmon Creek Trail as popular among "hikers, fishermen, swimmers, and family-friendly mountain bikers" (EA, p. 14). This characterization reflects genuine use but omits whitewater kayakers and rafters, who access Salmon Creek independently of the trail system and whose needs with respect to channel integrity, put-in and take-out access, and hazard management are distinct from trail-based users. We urge the Forest Service to include this user group explicitly in future planning efforts on streams with established river recreation, and to consult with American Whitewater and local paddling clubs as part of that process.

Salmon Creek is a beloved and significant whitewater resource with an established paddling history spanning several decades. The creek supports intermediate to advanced whitewater kayaking, and its reaches are documented in the American Whitewater National Whitewater Inventory, a nationally recognized database of recreational river resources maintained by our organization.[†] This documentation reflects not informal or incidental use, but a sustained paddling community with a stake in the runnability and safety of this waterway. The Salmon Creek drainage draws boaters from throughout the Willamette Valley and the broader Pacific Northwest.

We recognize that the introduction of large woody debris to Salmon Creek is not a stated purpose or intended outcome of the Dead Mountain project. However, we respectfully urge project managers and implementation crews to remain aware that incidental woody debris recruitment - from felling operations near stream channels, slash management in riparian buffers, or equipment activity adjacent to the creek - can create serious and life-threatening hazards for whitewater boaters. Strainers and debris accumulations in moving water are among the most dangerous conditions paddlers encounter and can be fatal even for experienced recreationists. We ask that implementation planning include explicit crew awareness of active river recreation in the Salmon Creek Corridor, and that any debris incidentally entering the channel be identified and removed promptly.

We support the Dead Mountain project moving forward and appreciate the District's efforts to improve forest health and recreational access in the Salmon Creek watershed. We ask only that implementation reflect the full range of public values this waterway provides.

Respectfully submitted,

Clinton Begley

Executive Director

American Whitewater