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Lyn Medley
Detroit Ranger District, National Forest Service
HC 73 Box 320
Mill City, OR 97360
Sent via electronic mail to: lmedley@fs.fed.us

Re: Comment on Ruth and Morning Star Mine Engineering Analysis and Cost Assessment

Dear Ms. Medley,

American Whitewater appreciates having the opportunity to provide comment on the Engineering Evaluation and Cost Analysis for the proposed clean up of the Ruth and Morning Star mining sites under CERCLA. The inactive mines are located 2 miles east of Jaw Bone Flats in the Opal Creek Scenic Recreation Area, and the waste rock from the mines has the potential to contaminate nearby rivers and streams through leaching and mass wasting events.

American Whitewater is a national 501(c)(3) non-profit organization that works to conserve and restore our nation's whitewater resources and enhance opportunities to enjoy them safely. With over 5,500 members and 100 affiliate clubs, we represent the conservation interests of tens of thousands of whitewater enthusiasts nationwide. We have a strong membership base throughout Oregon and the Pacific Northwest. We place great importance on protecting naturally functioning river ecosystems, including their fish and wildlife, geomorphic processes, and potential to provide clean and safe drinking water. Our membership highly values our nation's river systems and associated riparian zones, and we have a direct interest in seeing this country's rivers healthy and clean for everyone to enjoy. Our members recreate on Battle Axe Creek, Opal Creek and the Little North Santiam River, and we write to support the clean up of the Ruth and Morning Star mines in order to prevent future mass wasting events and leaching of toxic pollutants into the surface water.

Battle Axe Creek is known as a challenging backcountry whitewater run that is occasionally paddled. Opal Creek has been run from its headwaters continuing on down the Little North Santiam. While the entire drainage is known as a destination for exploration and adventure in a backcountry setting, the run on the Little North Santiam from Gold Creek to Three Pools is among the most popular winter creek runs in the region for intermediate to advanced paddlers. This segment is popular with local paddlers in the communities of Corvallis and Eugene, and attracts visitors from around the world. The run itself features great intermediate whitewater through a spectacular river canyon that passes through old-growth forest. The high water quality of this drainage is one of its defining features—crystal clear water and beautiful pools between the drops round out what is one of the best boating adventures in the entire region.

As avid whitewater boaters, our members regularly recreate on rivers during and immediately following high rain events, which is when the chance for polluted runoff entering the river is the highest. While the Human Health Risk Assessment assumes that recreational users are exposed at Jawbone Flat through camping, hiking, fishing and hunting activities,¹ we note that boating and kayaking are not mentioned in the document. The assumptions in the Human Health Assessment about the length and frequency of exposure to surface water do not adequately capture the exposure level of whitewater boaters. The DEQ guidance assumes that people between the ages of 7 and 70 years old are exposed between 4 and 20 days per year, every year for 9 to 30 years. The exposure time was between 30 minutes and 1 hour per day.²

Boaters have direct and frequent contact with surface water in Battle Axe Creek and the reaches downstream on Opal Creek and the Little North Santiam for several hours over a day of boating. Depending on the section boated, paddlers can be expected to spend 3-6 hours/days in the water. The paddlers who most frequently paddle this run may do so up to a dozen times in a year.

American Whitewater supports efforts to reduce the potential for exposure to hazardous pollutants from the abandoned Ruth and Morning Star Mines for the sake of human and ecological health, so long as the final action is protective enough for all recreational uses of the river, including whitewater boating.

We appreciate your consideration of our comments. Please do not hesitate to contact us with questions.

Sincerely,



Thomas O'Keefe, PhD
Pacific Northwest Stewardship Director



Megan Hooker
Associate Stewardship Director

¹ Engineering Evaluation/Cost Analysis, Ruth Mine and Morning Star Mine – Opal Creek Scenic and Recreation Area, Willamette National Forest, Marion County, Oregon, Perkins Coie LLP, November 7, 2012, p. 18.

² *Id.*