



December 3, 2019

Public Comments Processing:

Attn: Docket No. FWS-R1-ES-2019-0091, MS: JAO/1N

U.S. Fish and Wildlife Service

American Whitewater submits these comments regarding the scope of the U.S Fish and Wildlife's Draft Environmental Impact Statement (DEIS) analysis being performed pursuant to the National Environmental Policy Act (NEPA) to evaluate the potential impacts on the human environment caused by alternatives to the Deschutes River Basin Habitat Conservation Plan (HCP). We appreciate the opportunity to participate at this stage of the NEPA process.

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954 with approximately 6,000 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.

In Oregon, American Whitewater represents the interests of approximately 3,000 members and supporters; an active online group that is dedicated to planning, discussion, and communication of whitewater paddling in Bend has approximately 2,000 members¹ and every year, thousands of whitewater kayakers and rafters enjoy the many sections of the upper Deschutes from Benham Falls to Bend. Boaters also look forward to high water releases on the Crooked River, and many boaters come from out of town or out of state to enjoy these paddling opportunities.

Bend, OR is an exemplary example² of how recreation can draw people to visit, live, and conduct business in our state, and river recreation is one of the ways that outdoor recreation plays a vital role in Bend's economy, and continues to be a draw for people to live and work in Central Oregon. American Whitewater believes that protecting rivers and reasonable, safe recreational access to them is important to both conservation and recreation outcomes and supports strong local economies and community health. We also believe that conservation efforts, when done in a collaborative and

¹ <https://www.facebook.com/groups/374220869305452/>

² <https://bendchamber.org/bend-oregon-lifestyle/outdoor-industry-thriving-one-oregon-city/>



integrative manner, can work in concert with recreation interests. We additionally understand that when all relevant stakeholders of a landscape are included in early planning efforts, conservation does not have to come at a cost to recreation opportunity and vice versa.

I. SUMMER WHITEWATER RECREATION ON THE UPPER DESCHUTES

Many of our members and supporters engage in recreational activities on the Upper Deschutes River and are concerned about impacts caused by the proposed alternative on flow-dependent river-based recreation. The HCP should take into account the impacts of river recreation as flow regimes are altered, as residents and visitors to Central Oregon enjoy recreational paddling on many sections of the Deschutes River.

The below described river sections (organized from downstream to upstream) are well documented and treasured whitewater resources to both local paddlers, and resources that attracts visitors from around the world in the summer.

RIVER SEGMENT 1: MEADOW PICNIC AREA TO FAREWELL BEND PARK

Source: <https://www.americanwhitewater.org/content/River/detail/id/10686/>

This run is known locally as “Meadowcamp” and is an excellent class IV to IV+³ run, within the Bend city limits that flows all summer. When everything else is dry, paddlers from out of town travel to enjoy prime water levels, and locals have this as a staple in-town resource for recreation and training. Meadowcamp is also the venue for an annual downriver whitewater race⁴ which has been a featured event of the Subaru Outdoor Games.⁵

A flow range that supports whitewater recreation on this segment is between the range of 1600 to 2300 CFS at Benham Falls (USGS 14064500 DESCHUTES R AT BENHAM FALLS NR BEND, OREG.) Paddlers use the Benham gauge, but the actual flow is significantly less than that as irrigation demand diverts water upstream at Lava Island, and at the rapid named “Dammit”. From late April through the middle of September, flows are almost always between 1700 and 2200 CFS on the Benham gauge, and most paddlers consider the easiest level for Meadowcamp to be at flows of 1800-1900 CFS. At lower water levels, more rocks and hazards are exposed which makes the run more technical and difficult. If the flow drops below 1600 CFS at this gauge, the river no longer supports reasonable whitewater navigation and actually creates considerable river hazards.

³ https://www.americanwhitewater.org/content/Wiki/safety:internation_scale_of_river_difficulty

⁴ <https://www.facebook.com/meadowcamrace/>

⁵ <https://theoutsidegames.com/all-events/water-events/>



RIVER SEGMENT 2: [ASPEN TO LAVA ISLAND FALLS](https://www.americanwhitewater.org/content/River/detail/id/1505/)

Source: <https://www.americanwhitewater.org/content/River/detail/id/1505/>

This is known as “the Big Eddy section” which is a popular summer raft trip^{6,7} for commercial outfitters in Bend who take clients down throughout the summer. Every year, local commercial rafting companies guide over 20,000 paying customers through the popular Big Eddy section of the Upper Deschutes. High summer flows (>1800 CFS Benham gauge) are the most popular trips. In the fall and spring, when flows are switching between summer and winter levels, “Sous Hole” becomes a very good park and play hole.⁸ Ideal levels for Sous Hole are 1200-1600 CFS (USGS 14064500).

RIVER SEGMENT 3: [LAVA ISLAND FALLS TO MEADOW PICNIC AREA](https://www.americanwhitewater.org/content/River/detail/id/3075/)

Source: <https://www.americanwhitewater.org/content/River/detail/id/3075/>

This 1.5 mile section, referred to by locals as "Lava", runs all year. Winter flows vary between 500 and 1000 CFS. In the summer, levels are typically between 1700 and 2200 CFS (USGS 14064500).

RIVER SEGMENT 4: [DILLON FALLS TO ASPEN](https://www.americanwhitewater.org/content/River/detail/id/10684/)

Source: <https://www.americanwhitewater.org/content/River/detail/id/10684/>

This section is run at winter flows of 500 to 1100 CFS and at summer flows of 1700 CFS or greater (USGS 14064500).

RIVER SEGMENT 5: [BENHAM FALLS TO DILLON FALLS](https://www.americanwhitewater.org/content/River/detail/id/3074/)

Source: <https://www.americanwhitewater.org/content/River/detail/id/3074/>

Benham Falls remains a formidable class V rapid that local experts and visiting paddlers run at flows between 500 and 2200 CFS (USGS 14064500)

⁶ <https://visitcentraloregon.com/central-oregon-stories/big-eddy-bigger-thrills-whitewater-fun-for-the-family/>

⁷ <https://www.suncountrytours.com/rafting-trips/whitewater-rafting/trip-names/the-big-eddy-thriller>

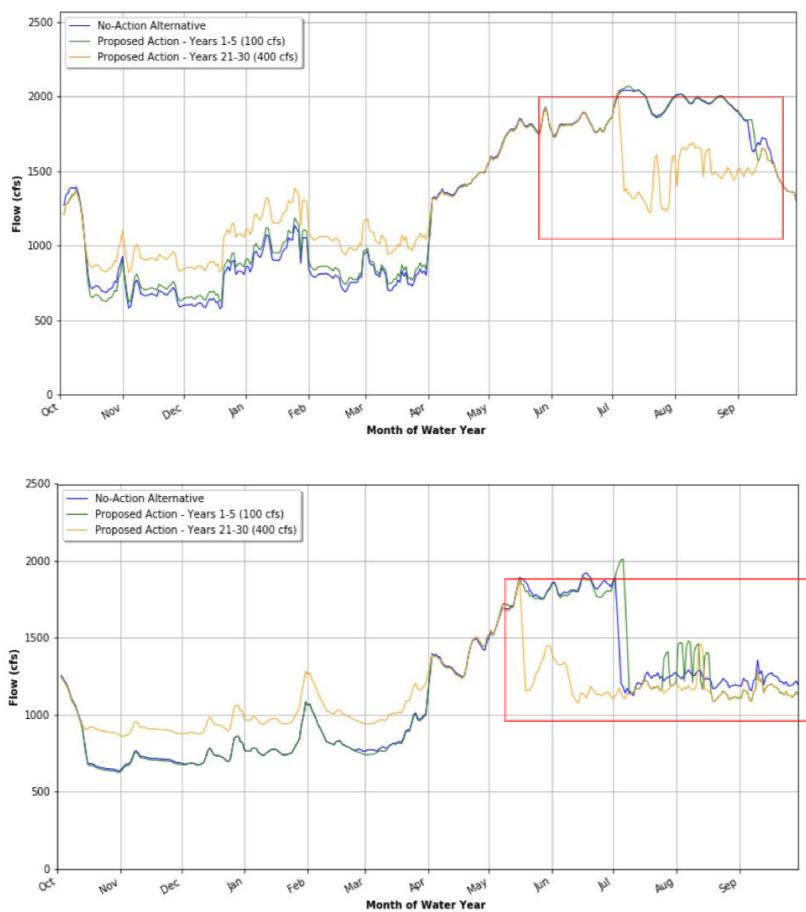
⁸ https://www.nrs.com/boating_tips/paddlersdictionary.asp

II. IMPACTS TO WHITEWATER RECREATION & COMMERCIAL GUIDING

U.S. Fish and Wildlife Service

Appendix 3.2-A
Water Resources Technical Supplement

Figure 36. The Deschutes River Hydrograph for the No-Action Alternative and Proposed Action in Years 1–5 and Years 21 through 30 in Representative Normal (upper) and Dry (lower) Years at the BENO Gauge



We are concerned that the proposed action will result in adverse impacts to existing recreational paddling (both outfitters and the general public) on segments of the upper Deschutes River; we base this determination on the proposed flow changes in the release from Wickiup Reservoir, as indicated in the Proposed Action for years 21-30 of 400 cfs. A reduction of summer flows that is below the recommended flow range identified for each segment can create hazardous navigation conditions for paddlers, and ultimately cause the loss of this paddling resource entirely. American Whitewater is



most concerned with the impacts to the “Meadowcamp” section and the “Big Eddy” section since these two sections are most sensitive to flow changes, and are the most popular sections on the Upper Deschutes for whitewater paddling in the summer. Without a recreational flow study, paddlers suggest that a flow range for “Meadowcamp” remains at 1600 to 2300 CFS at Benham Falls (USGS 14064500) from May through early September, as historical flows have allowed recreational and commercial paddling during these months (Figure 36). As Figure 36 also illustrates, the Proposed Action would eliminate recreational paddling opportunities in years 21-30 (400 cfs), months from July - September in normal years and months from June-July in dry years with historically navigable flows.

Both the Upper and Lower Deschutes River are designated and protected under the Wild and Scenic Rivers Act,⁹ and in the Comprehensive Management Plan recreation is identified as an Outstandingly Remarkable Value in all three designated segments of the Upper Deschutes to be protected and enhanced.¹⁰

III.NEED FOR A RECREATIONAL FLOW STUDY

American Whitewater believes that a variety of recreational activities can still be provided for while also balancing conservation goals. In order to do this, the best information must be made available to determine flow conditions that can still support summer recreational paddling on the Upper Deschutes while also meeting objectives tied to minimum flow releases in the winter from Wickiup Reservoir. A recreational flow study should be conducted to determine the impacts of the various proposed alternatives on summer paddling conditions – this study should be done in consultation with American Whitewater and with local whitewater paddling experts and local commercial guides who are familiar with each section on the upper Deschutes. The methodology of Shelby and Whittaker (2005) has been used in numerous regulatory proceedings to determine instream flow needs for recreation and would be appropriate for the Deschutes River.¹¹

We strongly urge that appropriate research be done and that the appropriate recreation experts and entities be consulted to adequately and appropriately address the potentially detrimental impacts of the proposed action in this plan on already existing whitewater recreation on the various sections of the upper Deschutes that are enjoyed by whitewater paddlers and commercial guiding companies.

⁹ <https://www.blm.gov/sites/blm.gov/files/documents/files/wsr-orwa-deschutes1-map.pdf>

¹⁰ <https://www.rivers.gov/documents/plans/upper-deschutes-plan.pdf>

¹¹ Shelby, D., B. Shelby, and J. Gangemi. 2005. Flows and Recreation: A Guide to Studies for River Professionals. <<https://www.nps.gov/ncrc/programs/hydro/flowrec.htm>>,



A handwritten signature in black ink that appears to read 'thomas o'keefe'.

Thomas O'Keefe
Pacific Northwest Stewardship Director

A handwritten signature in black ink that appears to read 'Priscilla Macy'.

Priscilla Macy
Regional Coordinator