



Thomas O'Keefe, PhD
Pacific Northwest Stewardship Director
3537 NE 87th St.
Seattle, WA 98115
okeefe@amwhitewater.org

March 19, 2010

sent electronically

Attn: Pat Foley
Rogue Valley Council of Governments
PO Box 3275
Central Point, OR 97502
Email: pfoley@rvcog.org

RE: Comments of American Whitewater on Gold Ray Dam Project Environmental Assessment

Dear Pat Foley:

Thank you for the opportunity to provide comment on the Gold Ray Dam Project Environmental Assessment (EA). We are strongly supportive of Alternative 1 that proposes the complete removal of Gold Ray Dam. We agree with the environmental analysis that the proposed action will improve fish passage and habitat and address the short- and long-term liabilities posed to Jackson County by Gold Ray Dam. This is a cost effective alternative that in addition to the important fishery benefits will enhance river-based recreation opportunities of value to our membership.

Interest of American Whitewater

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954. We have over 6,000 members and 100 local-based affiliate clubs, representing approximately 80,000 whitewater paddlers across the nation. American Whitewater's mission is to conserve and restore America's whitewater resources and to enhance opportunities to enjoy them safely. As a conservation-oriented paddling organization, American Whitewater has an interest in the Rogue River, one of our nation's first Wild and Scenic Rivers. A significant percentage of American Whitewater members reside in the Rogue River valley and value the recreational opportunities this river provides. Our members have been actively engaged in conservation and restoration efforts in the basin including the removal of Savage Rapids and Gold Hill dams, notching of Elk Creek dam, stewardship of the Rogue Wild and Scenic River, and relicensing of the Prospect Hydropower Project on the North Fork Rogue. American Whitewater supported Jackson County's application for funding through the National Oceanic and Atmospheric Administration (NOAA) Coastal and Marine Habitat Restoration Project Grant under the American Recovery and Reinvestment Act (ARRA) to evaluate the feasibility of removing Gold Ray Dam.

Comments

The EA states that "[dam removal] would provide for full-day guided raft trips,

though the lack of Class IV level and higher rapids makes this uncertain."¹

We note that Class IV rapids are not a prerequisite for a whitewater boating experience and the majority of commercial rafting opportunities in the country do not feature rapids higher than Class IV. Outfitters offer many trips that have no Class IV rapids at all (e.g. runs near Galice on the Rogue, or near Tree of Heaven on the Lower Klamath). Furthermore, the addition of the reach from Tou Velle to Gold Ray would provide an option to extend the current half-day trip from Gold Ray to Gold Hill to a full day. This trip would still feature the existing Class IV rapids at Nugget and Powerhouse, plus whatever new whitewater might underlie Gold Ray.

The EA also states that "flat water boating opportunities would be substantially reduced with the removal of Gold Ray Dam and the restoration of free-flowing conditions."² While strictly flatwater opportunities will be reduced, moving-water canoe opportunities would be substantially enhanced. For those providing local instruction during the summer when the Klamath is not an option due to toxic algae, the only local option available is the Rogue. The reach from Tou Velle to Gold Ray has the potential to serve as an excellent destination for canoe excursions on moving water.

Conclusion

We thank you for the opportunity to provide comment on this EA. With the exception of the minor points above that we feel further support the proposed action, we find the analysis complete and thorough. Please do not hesitate to contact me if you have any questions regarding the interests of river-based recreational users who value the benefits of restored rivers.

Sincerely,



Thomas O'Keefe, PhD
Pacific Northwest Stewardship Director

¹ At Page 3-5 Boating/Canoeing paragraph 2, Gold Ray Dam Project Environmental Assessment Draft, February 2010.

² At Page 3-5 Boating/Canoeing paragraph 3, Gold Ray Dam Project Environmental Assessment Draft, February 2010.