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May 21st, 2020

Richard Periman, Forest Supervisor
Mt. Hood National Forest
16400 Champion Way
Sandy, OR 97055

Dear Mr. Periman:

I am writing to ask you to consider modifying Forest Order 06-22-00-20-01,¹ the Mt. Hood National Forest Recreation Site Closure Order for Developed Recreation Sites as defined by 36 CFR § 261.2. I am specifically requesting that you consider opening day-use sites along the Clackamas Wild and Scenic River this week. This action would align the Forest with Governor Brown's orders and guidance and other recreation providers that are opening their sites. Our request is limited to day-use sites that provide opportunities for local community members to enjoy close-to-home recreation. We are concerned that continued closure of sites along the Clackamas River limits opportunities for our members in Clackamas County and pushes users to other areas that are open.

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. We have a significant membership that lives in communities along the Clackamas River and throughout Clackamas County.

Your Forest Order closing federal lands and facilities on the Mt. Hood National Forest, and Forest Order No. 06-00-00-20-01 from the Regional Forester,² were signed in March to align with state and local measures directing people to stay home to save lives. On Thursday May 7th, Oregon Governor Brown announced the Phases for Reopening Oregon and provided Reopening Guidance for outdoor recreation on May 17th.³ We believe whitewater boating is one of the activities that can be enjoyed locally and it is important to our members living in the communities along the Clackamas River. It is time to once again align with state and local measures.

¹ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd717023.pdf

² https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd718616.pdf

³ <https://sharedsystems.dhsosha.state.or.us/DHSForms/Served/le2342E.pdf>

We have been in close contact with land management agencies and the Governor's office prior to and following her announcement on outdoor recreation to discuss how whitewater boating can be enjoyed in a manner consistent with the guidance provided by the state and public health officials. We recently published guidelines for how whitewater boaters can meet physical distancing guidance;⁴ while paddlers in individual water craft can easily physically distance on the river, they will need to use extra caution at access points and plan their shuttles with members from their household, use a bike, or jog.⁵ Among the rivers in the State of Oregon, we believe the Clackamas River is an ideal river that paddlers can enjoy while practicing physical distancing. Additionally, emerging research shows that COVID-19 is largely spread through indoor transmission, with a detailed study of 380 individual outbreaks finding only one example of transmission in an outdoor environment.⁶

We understand that maintenance of restroom facilities is a particular concern. In partnership with land managers and other organizations representing the outdoor recreation community, we launched the Recreate Responsibly campaign.⁷ We are encouraging our community to be prepared with their own water, personal hygiene products, and to carry a wag bag. We are also encouraging paddlers to stay close to home and suggesting that if you are traveling so far that you need a restroom stop, you are probably going too far. For our members living in Clackamas County, who value the river as their backyard run, the ability to use and enjoy this river is important to them.

We appreciate the partnership we have had with the Forest Service over many years including our efforts with Portland General Electric to protect and enhance recreational opportunities within the Wild and Scenic corridor. We look forward to continued partnership with you and your agency as we work to open up appropriate recreational opportunities while respecting the health and safety needs that need to be considered.

Sincerely,



Thomas O'Keefe, PhD
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⁴ <https://medium.com/american-whitewater/paddling-in-a-pandemic-keep-it-local-4de61da92f5>

⁵ We discuss the recent announcements by the Governors regarding outdoor recreation and the implications for paddlers on the April 29th River Talk Podcast
<<https://www.rivertalkpodcast.com/podcast/ep-78-talking-with-tom-okeefe-from-american-whitewater-about-river-closures-and-openings/>>

⁶ <https://www.medrxiv.org/content/10.1101/2020.04.04.20053058v1>

⁷ <https://www.recreateresponsibly.org/>