



Thomas O'Keefe, PhD  
Pacific Northwest Stewardship Director  
3537 NE 87<sup>th</sup> St.  
Seattle, WA 98115  
[okeefe@americanwhitewater.org](mailto:okeefe@americanwhitewater.org)

---

July 31st, 2021

Jeff Kitchens Deschutes Field Manager  
Bureau of Land Management, Deschutes Field Office  
3050 NE 3rd Street  
Prineville, OR 977545

Comments Electronically Submitted: <[BLM\\_OR\\_PR\\_LDR@blm.gov](mailto:BLM_OR_PR_LDR@blm.gov)>

RE: Business Plan for the Lower Deschutes Wild & Scenic River, Draft, 2021

Dear Mr. Kitchens:

I am writing on behalf of American Whitewater and our interest in the Business Plan for the Lower Deschutes Wild & Scenic River, Draft, 2021.<sup>1</sup> We appreciate the opportunity to provide public comment on this Plan and the proposed changes in the fee structure for the Deschutes Wild and Scenic River.

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 in the Pacific Northwest who enjoys the opportunities the Deschutes Wild and Scenic River provides for day trips and overnight trips.

## Comments

---

<sup>1</sup> Business Plan for the The Lower Deschutes Wild & Scenic River, Draft, 2021, <<https://www.blm.gov/sites/blm.gov/files/docs/2021-04/pri-deschutes-plan.pdf>>.

American Whitewater understands that the proposed changes will amend the current individual special recreation permit fee for floating the river (the boater pass) to a flat rate of \$5/person/day and add a new \$5/person/night camping fee in Segments 1 and 4 of the Lower Deschutes Wild and Scenic River on BLM-managed public lands where no vehicle access is present. We are supportive of these changes but offer the following comments on the Plan for your consideration:

- In the description of segment 3A from Buckhollow to Pine Tree the Plan characterizes it as a “short scenic float without rapids, for those with less experience or short on time.”<sup>2</sup> This segment has two significant rapids that include Trestle Hole and Wreck Rapids. Trestle Hole is rated class II but can become more significant at higher flows. Wreck Rapids is a class III rapid. The description should be revised accordingly to reflect the presence of rapids. The road is high above the river in this stretch and it is not an appropriate section for inexperienced boaters.
- The description of segment 4 characterizes the reach as having “lesser amounts of whitewater boating.”<sup>3</sup> While the first 16 miles are a more moderate float, the final 8 miles include several class II and class III rapids that extend down to the Columbia River confluence including the following named class III rapids of intermediate difficulty: Washout Rapids (mile 7.5), Gordon Ridge Rapids (mile 5.7), Colorado Rapids (mile 3.9), Rattlesnake Rapids (mile 2.6), and Moody Rapids (mile 0.6).
- From Table 1 and the narrative describing contract services it appears that approximately 10% of annual costs are related to toilet pumping and trash pick up.<sup>4</sup> The Plan further notes that “individual special recreation permit fees help pay for river operations like trash removal and maintenance of toilet facilities at remote campsites.”<sup>5</sup> The Deschutes Wild and Scenic River is unique among Wild and Scenic Rivers in the region in offering a high number of toilets along the river as well as trash services. On a recent trip down the river corridor we observed toilets that were in immediate need of pumping and that were not adequately stocked with toilet paper. If fees are increased, the public will have a higher expectation that facilities will be adequately maintained. We assume the Plan recognizes this commitment. Alternatively, it may be worth exploring whether it is possible to phase out toilets maintained by the agency in favor of

---

<sup>2</sup> At Section C.1.3a, Page 12, Ibid.

<sup>3</sup> At Section C.1.4, Page 12, Ibid.

<sup>4</sup> At Table 1, Page 14, Ibid.

<sup>5</sup> At Section D.1, Page 18, Ibid.

encouraging river runners to carry out their own waste as is standard practice on other rivers throughout the region and across the West.<sup>6</sup>

- Figure 7 illustrates the 68% increase in use in segment 3, the highest among different river segments.<sup>7</sup> The proposal to establish a flat \$5.00 camping fee per person per day in segments 1 and 4 would not apply to segment 3. We are concerned that this could drive additional use to segment 3 where camp sites are already limited with several of poor quality (e.g. those around Ferry Canyon that have extensive grazing and other impacts from cattle). We encourage the BLM to continue monitoring Segment 3 to determine if the change in fees results in increased use and greater campsite competition for the limited sites that exist.
- The Plan notes that among the benefits of the proposed fee changes is a “simplified fee structure for public understanding.”<sup>8</sup> Despite the proposed changes the fee structure for the Deschutes Wild and Scenic River is among the most complicated of any river in the West. For trips that extend through multiple segments it can take hours of planning with river maps (which need to be updated to more accurately reflect current condition of available sites) identifying potential camp sites, cross referencing to river segment maps, and then filling out a complex table on recreation.gov to select river segments. We do not have specific recommendations at this time but more work can be done to truly achieve a more simplified fee structure and process for obtaining permits on the Deschutes Wild and Scenic River.

## Conclusion

Thank you for the opportunity to provide comment on the Business Plan for the Lower Deschutes Wild & Scenic River. We appreciate all the hard work you and your team do to manage this exceptional regional resource.

Sincerely,



Thomas O'Keefe, PhD  
Pacific Northwest Stewardship Director

---

<sup>6</sup> While overnight boaters must carry an approved human waste pack out system, our informal assessment on a recent trip was that most groups did not use their system given the large number of toilets along the river corridor that are maintained by agencies.

<sup>7</sup> At Figure 7, Page 16, Ibid.

<sup>8</sup> At Section E.4, Page 23, Ibid.