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Dan Holladay
Mayor, Oregon City
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December 13th, 2019

Dear Mr. Holladay:

I am writing on behalf of American Whitewater and our interest in the boat ramp within Clackamette Park. The boat ramp forms a feature at certain flows and tide ranges that has become a regional destination for playboating. Playboating is a freestyle form of whitewater kayaking, with similarities to ocean surfing, where kayakers surf and perform different moves on a standing river wave. We understand that the boat ramp has issues that make it less usable for its intended purpose as a launch point for trailered watercraft. Before the boat ramp is removed or rebuilt, however, our members have an interest in opening a dialogue on the new use that has emerged by whitewater kayakers.

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. A significant percentage of our membership lives in the greater Portland area and takes advantage of recreational opportunities on the Clackamas River. The Clackamas River, and the Clackamette Wave site in Clackamette Park, is recognized in the National Whitewater Inventory that we maintain.¹

¹ <https://www.americanwhitewater.org/content/River/detail/id/1495/>

History of Studies to Identify a Playboating Location on the Clackamas River

For the past two decades the regional paddling community has had a strong interest in identifying a location suitable for playboating in the greater Portland Area, and a number of sites have been investigated and evaluated.

In September 2004 Portland General Electric completed a study to investigate regional demand for whitewater kayaking and interest in whitewater playboating feature.² The utility also conducted a companion study that assessed potential playboating locations that included Faraday Diversion Reach, Milo McIver State Park, Pump Station (just upstream from Interstate 205) and Bob's Hole (on the Wild and Scenic segment of the Clackamas River).³ Based on these studies, the Federal Energy Regulatory Commission determined demand for a whitewater boating feature existed,⁴ and required PGE to “conduct a study of the feasibility of constructing a whitewater boating feature in either the Faraday diversion reach or below River Mill dam adjacent to Milo McIver State Park, and file a report, for Commission approval, of the results of the feasibility study, including any recommendations for constructing the feature at either of the sites.”⁵

Portland General Electric found that construction of a whitewater boating feature in the Faraday reach of the Clackamas River was likely to be infeasible under the base flow of 250 to 280 cfs. The utility determined that the River Mill tailrace, has the necessary flow, drop and access to create a feature but resource agencies expressed concern with its proximity to fish passage facilities associated with the hydroelectric project. The utility ultimately concluded that neither site was likely to be feasible.⁶

We Love Clean Rivers coordinated efforts with the evaluation conducted by Portland General Electric and completed a more extensive review of feasible locations for man-made whitewater waves or play feature locations on the Lower Clackamas River. The report was finalized in Spring 2014 as the “Clackamas Whitewater Features Pre-Design Report”, which summarized possible locations, economic benefits, permitting issues, and possible design concepts for two locations. A supplemental report of “Clackamas Whitewater Features Site Reconnaissance Supplemental Narrative” was published in July 2014 and subsequently revised in September

² <https://www.americanwhitewater.org/content/Document/view/documentid/162/>

³ <https://www.americanwhitewater.org/content/Document/view/documentid/160/>

⁴ At 5-12, Final Environmental Impact Statement, Clackamas River Hydroelectric Project, FERC P-2195, Federal Energy Regulatory Commission, December 2006. FERC eLibrary Accession Number 20061221-4000.

⁵ License Article 407, Portland General Electric Company Project No. 2195-011, Order Issuing New License, December 21, 2010, 133 FERC ¶ 62,281

⁶ Letter regarding whitewater features at Clackamas River Hydroelectric Project, FERC Project No. 2195, from Architect John Anderson to Portland General Electric representative Tony Dentel, March 27th, 2014.

2014. Sites in these assessments included McIver Park, Barton Park, Oregon City Water Intake Pump Station, High Rocks City Park, Paradise Point Ledge, Tualatin River Diversion Dam, Willamette Falls Area, and Kellogg Creek Dam.

Despite the extensive inventory of sites that was completed over the past two decades, no viable alternative emerged to pursue a project until the Clackamette Wave appeared on its own.

Value of the Clackamette Wave as a Playboating Location on the Clackamas River

The Clackamette Wave is now enjoyed by paddlers from across the greater Portland region and surrounding states. It forms during periods of low flow when the Clackamas River is below 1200 cfs and the stage height of the Willamette River is under 3 ft. The wave forms two to three hours prior to low tide (less than 3 ft) and remains surfable for up to an hour later. During a normal season, this happens from late July through October/November. This allows paddlers to schedule their session on the wave in advance making it predictable for surfing enthusiasts. This also offers the potential to hold local or national surfing contests. It is close to a major population center, making it convenient for a significant number of individuals with time for a short session (e.g. after work or during a lunch break). The seasonality of this feature is it appears during low flows when other whitewater opportunities on rivers are unavailable and while not interfering with fishing or motorboat use. In short, it has many desirable attributes that were among those considered in the search for a site throughout the region. Your community has an incredible regional asset that, while unplanned, is now serving a regional demand for whitewater playboating.

Before steps are taken to consider removing or rebuilding the boat ramp, we would like to discuss opportunities to retain the structure or otherwise accommodate the interest of whitewater playboating in any redevelopment that occurs.

Sincerely,



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cc:

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