



Thomas O'Keefe, PhD  
Pacific Northwest Stewardship Director  
[okeefe@americanwhitewater.org](mailto:okeefe@americanwhitewater.org)

---

February 9th, 2021

Elizabeth Burghard  
BLM Medford District Manager  
3040 Biddle Road  
Medford, OR 97504  
<ebugar@blm.gov>

Merv George  
Rogue River-Siskiyou National Forest Supervisor  
3040 Biddle Road  
Medford, OR 97504  
<merv.george@usda.gov>

Dear District Manager Burghard and Forest Supervisor George,

We are writing to express a need for updated management guidance and in support of a new Comprehensive River Management Plan (CRMP) for the lower Rogue Wild and Scenic River and its newly-designated tributaries.

There have been significant changes in river management and visitor use since the current CRMP was issued nearly 50 years ago.<sup>1</sup> Additionally, the creation of the Wild Rogue Wilderness Area in 1978 and the recent designation of 34 Rogue tributaries as Wild and Scenic have significantly altered the management situation and regulatory framework for the river and its watershed.<sup>2,3</sup> Clearly, a new analysis and plan are needed.

The development of a new CRMP presents a great opportunity to create a plan that is truly comprehensive, forward-thinking, adaptive, and that will serve to protect and enhance the values for which Congress added the Rogue and many of its tributaries to the National Wild and

---

<sup>1</sup> Department of the Interior, Bureau of Land Management, Rogue National Wild and Scenic River, Oreg., Notice of Revised Development and Management Plans, 37 FR 13408 (July 7th, 1972), <<https://www.rivers.gov/documents/plans/rogue-plan.pdf>>.

<sup>2</sup> Public Law 95-237

<sup>3</sup> Public Law 116-9

Scenic Rivers System while providing for public use and enjoyment of the river and surrounding lands.

We write to express our interest in participating in all stages that would lead to development of a new CRMP and to briefly identify some of the issues that we believe a new plan should address.

## About American Whitewater

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 members visit the lower Rogue Wild and Scenic River for recreational purposes that include boating, fishing, and hiking as well as for education, interpretation, inspiration, and physical and mental health.

American Whitewater has participated in the development of several recent CRMPs including most recently those for Fossil Creek Wild and Scenic River in Arizona and the Middle Fork Snoqualmie and Pratt Wild and Scenic Rivers in Washington State.

## Request for Early Participation and Engagement

As you and your staff are well aware, the development of a new CRMP for the Rogue River and its newly-designated tributaries will be a technical and complex task that will necessarily involve working closely with other agencies, local and state governments, Tribes, and a diverse group of stakeholders including partners, businesses, residents, and the public. The Rogue River holds special ecological, economic, social, and cultural significance, and it will be paramount for the CRMP development process to be open, inclusive, and center on the shared values and vision of these stakeholders as well as on the statutory and regulatory requirements. The process by which a new CRMP is developed will determine, to a fair degree, the plan that results as well as its success.

With this in mind, we respectfully request that your agencies engage stakeholders as early as possible in any CRMP pre-planning process. In particular, we would like to more fully introduce American Whitewater to you and your planning staff and have the opportunity to provide input

on the CRMP development process and discuss how our unique experience and expertise working with Wild and Scenic Rivers across the nation could be integrated into the effort ahead.

Even at this early juncture, there is mutual benefit to American Whitewater's participation in a CRMP pre-planning process, and we can likely provide useful input on upcoming steps such as data gap identification; assessing trends in whitewater river use, permitting, and planning; and analyzing the complex management situation specific to the lower Rogue.

Please contact Thomas O'Keefe, American Whitewater Pacific Northwest Stewardship Director, by phone (425-417-9012) or email <[okeefe@americanwhitewater.org](mailto:okeefe@americanwhitewater.org)> at the earliest appropriate opportunity to hold such an introductory discussion.

## Brief Issues

American Whitewater would participate fully in a CRMP development process, and we would bring forth additional information to the administrative record as the process progresses. For now, we would like to identify four issues we hope to see addressed in a new CRMP.

### Outstandingly Remarkable Values

Neither the original 1969 CRMPs separately developed by the BLM and USFS nor the joint agency CRMP that was finalized in 1972 and is still in effect specifically identified the river's outstandingly remarkable values (ORVs). These ORVs also need to be confirmed for the recently-added tributaries.<sup>4</sup> The analysis for a new CRMP should include an ORV resource assessment to thoroughly review all designated segments, determine or confirm which ORVs each segment possesses, and provide a detailed description of these ORVs to be used as a platform for the development of necessary management direction in the CRMP.

The Rogue River is a spectacular, diverse, and complex river system and it possesses many ORVs. Robust agency and stakeholder participation in their identification and documentation is necessary in order for the effort to be thorough and supportable. This is particularly important since ORVs form the foundation of most other components of the CRMP.

### Campsites

With the exception of a limited number of single-day visitors to the river canyon, all use of the river and its corridor involves an overnight stay either in a private lodge or, more commonly, in a campsite. The occupancy rate of campsites is very high, especially during river permit control season (May 15th - October 15th) and the proximate shoulder season, and there is often intense competition for available campsites. This is exacerbated by the lack of a consistently-applied management system that encourages groups to utilize campsites that are

---

<sup>4</sup> Senator Wyden provided a table listing both the general and specific ORVs identified during consideration of the legislation in the Congressional Record. Oregon Wildlands Act; Congressional Record Vol. 165, No. 145 (Senate - September 11, 2019), Pages S5440-S5442, <<https://www.congress.gov/congressional-record/2019/9/11/senate-section/article/S5440-2>>

appropriate for their group size (i.e., small groups in smaller campsites and large groups in larger campsites) or that allows reservation of sites.

While a plan was developed to identify campsites as small, medium, or large with corresponding labels for each group on their boat tag and a corresponding map,<sup>5</sup> we have observed that implementation of this voluntary system to encourage groups to select sites based on their group size has been inconsistently implemented. We urge a more consistent approach to educating trip leaders and evaluating this system with the 2021 season with active monitoring to better understand its effectiveness.

This issue should be analyzed and addressed in a new CRMP. In particular, a campsite allocation system based on camp and group size should be evaluated and these can be done in a manner that informs a new CRMP. There is a broad diversity of opinion amongst river and trail users as to how best manage campsites, and every effort should be made to address this component of the CRMP in a fully collaborative manner.

### Bears and Food Management

For many river runners, wildlife viewing opportunities along the river corridor are a highlight of a journey down the Rogue River. Bears are among the wildlife that enhance this experience but bear-camper interactions have been a problem when proper food storage practices are not implemented. Opportunity exists to better establish bear management goals and better educate river runners to avoid habituation of bears.

### Wildfire & Fire for Resource Benefit

The Rogue River is part of a pyrodiverse, fire-adapted ecosystem and the occurrence of natural wildfire is essential and expected. In fact, fire is an element that shapes many of the ORVs and scenery along the river. The new CRMP should take this into account and address the occurrence of wildfire, its management (including suppression), and its effects so that ORVs are protected before, during, and after a fire. The CRMP should include specific information about ORVs, sensitive areas, and other at-risk values and prepare this information for entry into the Wildland Fire Decision Support System (WFDSS) as one means toward protecting river values during wildfire response.

Because much of the river corridor is significantly departed from its natural fire return interval and is at high risk of experiencing uncharacteristically intense wildfire that may degrade certain ORVs, the CRMP should include specific management actions aimed at restoring the natural role of fire in the river corridor, including the use of prescribed fire and fire for resource benefit when appropriate.

---

<sup>5</sup> Wild, Scenic and Beyond; River Management Symposium 2018 presentation; Campsite selection on the Rogue WSR – Moving from campsite competition to campsite cooperation – Kai Allen; Thursday, October 15, 2018, 1:30-3:00.

## Conclusion

As one of the iconic rivers of the nation, and among its first to be designated Wild and Scenic, the Rogue has outsized significance. By virtue of its early designation, it did not initially have a CRMP and the one that was subsequently developed nearly 50 years ago no longer serves to adequately protect river values. We support development of a new, modern CRMP that includes the newly designated tributaries.

We look forward to working with you and your staff to help make a new Wild and Scenic Rogue River CRMP one of the best, most innovative, and adaptable management plans within the National Wild and Scenic Rivers System.

Sincerely,

A handwritten signature in black ink, appearing to read "T. O'Keefe". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Thomas O'Keefe, PhD  
Pacific Northwest Stewardship Director  
Seattle, WA

A handwritten signature in black ink, appearing to read "Scott Harding". The signature is written in a cursive, slightly slanted style.

Scott Harding  
Stewardship Associate  
Forks of Salmon, CA