

The backcountry experience as discussed in the *Master Plan* for Yellowstone National Park provides a "vital introduction to wilderness" and a place where the "visitor can test not only his desire but also his muscles."

I. Executive Summary

American Whitewater submits this proposal with the recommendation that the Park Service open four select sections of rivers for non-commercial whitewater recreation by kayak and canoe in Yellowstone National Park on a season-limited basis. Though American Whitewater would prefer to have all of the rivers and streams in Yellowstone opened to the boating public, we have limited our request to opening these four segments due to: 1) their unique value as whitewater resources to boaters of varying skill levels and interests, 2) the Park's need to balance use and resource protection, 3) the fact that whitewater recreation has no unique impacts relative to other human-powered recreation, 4) the ability of Park personnel to manage the resource on a limited basis, with the ability to open or close additional rivers in the future.

Opening the Black Canyon of the Yellowstone for whitewater recreation is American Whitewater's highest priority.

American Whitewater proposes that Yellowstone National Park staff work with us in opening and managing whitewater boating on the following river segments:

- Black Canyon of the Yellowstone
- Gardner River Canyon
- Lamar River
- Lewis River

“A man on foot, on horseback or on a bicycle will see more, feel more, enjoy more in one mile than the motorized tourists can in a hundred miles.”

-Edward Abbey, writer and former Park Ranger in Arches National Monument.

Yellowstone National Park was founded in 1872, and is the oldest Park in the country. It is enjoyed by millions of people every year (2,889,513 recreational visitors in 1997). American Whitewater recognizes that Yellowstone is an environment without parallel, and that its rivers, in many ways, define and create the region's dramatic landscapes. Yellowstone's rivers and streams provide a spectacular opportunity for the Park's visitors to visit and experience the Park and behold its natural splendor.

However, all of Yellowstone's rivers are off-limits to whitewater boating. The ban on whitewater recreation affects boaters throughout the country and is inconsistent with management policies in many of America's National Parks. Due to this ban, American Whitewater's members, as well as other non-commercial whitewater boaters across the country, are denied the opportunity of enjoying and benefiting from the experience of exploring Yellowstone's rivers and streams.

American Whitewater's goal is to establish a cooperative relationship between whitewater boaters and Yellowstone National Park while safeguarding Yellowstone's unique resources.

As described in our proposal:

- 1) Whitewater recreation is consistent with other recreational uses in Yellowstone.
- 2) Whitewater boating is consistent with the purposes for which the Park was established.
- 3) Whitewater boating will not have unacceptable impacts on visitor enjoyment or be an endangerment to participants or the public.
- 4) Whitewater boating is not a consumptive use of Park resources.
- 5) Whitewater boating will not have unacceptable impacts on Park resources.
- 6) Environmental impacts from whitewater boating are minimal relative to other recreational activities that are allowed in Yellowstone.

Our goal is to establish a cooperative relationship between whitewater boaters and the Park while safeguarding the unique resources of Yellowstone. This proposal is designed to allow whitewater boaters the opportunity of experiencing one of America's most outstanding natural areas in a manner consistent with Park policy on non-motorized use and resource protection.

American Whitewater began working on this proposal following a meeting with Yellowstone's Superintendent, Michael V. Finley, and staff in June of 1995 in which we discussed the issue of boating on rivers within the Park. As a result of the meeting, American Whitewater agreed to develop a proposal for opening Yellowstone's rivers to

Yellowstone National Park has the most extensive system of legally inaccessible rivers within America.

whitewater boating in which we would explore the issue in depth and formally present our position and recommendations on the subject. In developing and preparing this document, we have adopted a deliberate and methodical pace, allowing us to conduct a significant and substantial fact and opinion gathering process. As a result of our research into this issue, American Whitewater proposes that the Park open the Black Canyon of the Yellowstone, Gardner River Canyon, Lamar River, and Lewis River to whitewater recreation.

We have selected these four rivers segments based on several criteria, including: recommendations from our members, accessibility, presence of existing facilities (such as parking), quality of the whitewater experience (including a diverse range of whitewater experiences), the Park's ability to manage these resources, and unique quality of the Yellowstone experience.

Recognizing certain political and environmental realities and concerns, American Whitewater recommends:

- Limiting river access on a seasonal basis.
- Restricting commercial operations.
- Creating a system of direct and ongoing communications that includes all affected user groups.
- Collecting data on river use through the collection of permits
- Conducting a five-year reassessment of whitewater recreation between American Whitewater and Yellowstone National Park after data collection is completed.

Immediate implementation of these recommendations would permit American Whitewater and the Park an opportunity for collecting data and examining the resource and social impacts of whitewater boating within the boundaries of Yellowstone National Park.

As evidenced by the volume of comments and responses from our members (Appendix I), the issue of boating within Yellowstone National Park is extremely important to our

constituency. This issue has generated as much response as any other single issue on which American Whitewater has worked. It is truly an issue of national concern to boaters as demonstrated by the letters from both local and regional paddlers, and from those as far away as Alabama and California. Our members strongly favor access to the rivers within Yellowstone National Park, and the Yellowstone River in particular.

American Whitewater understands that there is some opposition to allowing whitewater recreation within Yellowstone. Arguments against whitewater boating are based on concerns for opening the Park to any new use, fears for the cumulative impacts of multiple recreational uses, and desires for restoring the Park to its most natural state. We hope that people with these views will take the time to carefully read our limited proposal and understand our position. This proposal was developed in an effort to minimize, if not eliminate these concerns, put them in perspective, and allow controlled use of Yellowstone's unique river resources for human-powered outdoor recreation. As we have described in our proposal, whitewater recreation can be managed effectively and will not result in any environmental impacts relative to other forms of human-powered outdoor recreation, which are permitted in Yellowstone.

The preservation and sustainability of Yellowstone's resources must take precedence over access.

American Whitewater supports conserving the outstanding resources of Yellowstone National Park. We believe this proposal demonstrates a method that allows limited, managed whitewater recreation while acknowledging our concern for the resource.

We do not wish to damage the resource or degrade the Yellowstone experience for other visitors. In fact, American Whitewater believes that the preservation and sustainability of Yellowstone's resources must take precedence over access. However, we also believe that our proposal is consistent with these statements and that whitewater recreation is an acceptable use of Yellowstone National Park. We believe that we can accomplish both!

Whitewater recreation can be managed effectively and does not result in any environmental impacts relative to other forms of human-powered outdoor recreation.

American Whitewater recognizes the difficulty facing the Park's staff in attempting to balance resource preservation with a variety of public uses. In this regard, American Whitewater believes that the management of public resources should be based on objective science and a fair standard of management. However, the current ban on river

running in Yellowstone National Park is unnecessary and unfairly discriminatory. Our proposal presents compelling arguments and data, which illustrate that:

- Whitewater boating is an appropriate use of Yellowstone National Park from a resource protection and public policy perspective.

- Whitewater boating can be managed according to accepted protocol.
- Whitewater boating will not cause significant impacts to Yellowstone's natural resources.
- Working with whitewater boaters, rather than banning use, can provide benefits for Yellowstone through the building of a strong and vocal constituency.

American Whitewater can help Yellowstone National Park staff open select rivers, and create a fair standard of management for whitewater boaters in the following ways:

- Identifying outstanding and diverse whitewater resources.
- Providing up-to-date and comprehensive information on whitewater boating.
- Facilitating communications between Park staff and whitewater users.
- Assisting with data gathering, management of whitewater issues, and future openings or closings of river sections within the Park based on data collected with rigorous scientific study.

This proposal addresses whitewater recreation from the perspective of resource protection and the equitable management of multiple recreational uses. The Park completed a similar study in 1988, entitled, "*Boating on Yellowstone's Rivers: An Analysis and Assessment*" (referred to as the *1988 Assessment*). However the Park's assessment is speculative in nature and fails to exercise an objective evaluation of impacts from whitewater recreation. American Whitewater's proposal addresses these flaws. In particular, we examine the perceived impacts from boating, and compare boating with the approved recreational uses within Yellowstone and America's other National Parks. Furthermore, we address the discrepancies between Yellowstone's ban on whitewater recreation and management of this activity within other National Parks.

American Whitewater's mission is to conserve and restore America's whitewater resources and enhance opportunities to enjoy them safely.

There have been significant advances that have occurred in whitewater recreation since the *1988 Assessment* was completed, including improvements in safety, skills, and technology. These advances have allowed routine whitewater exploration of rivers and streams that the Park Service indicated were unsuitable for navigation in 1988. Today, difficult rivers, comparable to the Black Canyon of the Yellowstone are run on a safe and consistent basis by advanced boaters.

This proposal directly addresses the concerns for resource protection by discussing the nine environmental parameters that were evaluated in the *1988 Assessment*. While some river segments within Yellowstone may not be appropriate for whitewater boating due to resource concerns and a changing environment, ***American Whitewater believes that whitewater recreation will not have cumulative impacts exceeding existing non-***

motorized recreational activities in the Park. Whitewater recreation certainly won't have the impacts associated with motorized use of the Park.

Park staff can manage whitewater recreation by working in partnership with American Whitewater, paddlers, clubs, and other organizations while using management tools that have proven effective for other backcountry activities in the Park. We feel strongly that we can identify an equitable solution allowing whitewater boating while protecting Park resources by guiding use through effective management and education, rather than through an arbitrary ban on river running.

The original ban on river recreation was inherently flawed because it was implemented to address another concern, overfishing, rather than river voyaging and recreation. There are better tools for managing anglers without banning access on Yellowstone's rivers.

While the restrictions were implemented based on concerns for resource conservation, they have had the effect of limiting a low-impact recreational use. Therefore this ban actually targets the wrong recreational group.

*Yellowstone and Yosemite
"should be kept as a great
national playground. In
both, all wild things should
be protected and the
scenery kept wholly
unmarred."*

▶ Theodore Roosevelt
(1908)

Today, whitewater boaters are denied the opportunity to enjoy more than 400 miles of rivers and streams within Yellowstone National Park. Current Park policy denies whitewater boating due to a number of reasons that we address in the following pages. American Whitewater hopes that this proposal will provide updated information on the increasing skills and abilities of whitewater boaters, a better understanding of how whitewater use can be

managed without denying access outright, and the opening of select river and stream segments to whitewater boaters in the future.

Providing an in-depth evaluation of sustainable, human powered, whitewater recreation is in keeping with the philosophy of our National Parks. It has been said that the "establishment of a Park is only the beginning; that if we do it right, we never stop establishing that Park, because we never stop learning about it, and about ourselves."

American Whitewater

American Whitewater is a national organization with a membership of over 7,750 individual whitewater boating enthusiasts and more than 150 local canoe club affiliates, representing approximately 60,000 whitewater paddlers. American Whitewater was organized in 1957 to protect and enhance the recreational enjoyment of whitewater sports in America. American Whitewater is dedicated to safety, education, and the preservation and conservation of America's free flowing rivers. This proposal is consistent with our mission to conserve and restore America's whitewater resources and to enhance opportunities to enjoy them safely.

American Whitewater's charter contains language with the purpose of:

- Encouraging the exploration, enjoyment, and preservation of America's recreational waterways by human-powered craft;
- Protecting the wilderness character of waterways through conservation of water, forests, parks, wildlife, and related resources;
- Promoting appreciation for the recreational value of wilderness cruising and of whitewater sports.

For more information about American Whitewater, please refer to the Appendices or contact the following:

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