

III. Proposal for Opening Select Rivers and Streams

Philosophically, American Whitewater believes that all of America's rivers should be open and accessible for public recreation. However, we also believe that it is sometimes appropriate to place limits on access if public use results in a significant degradation of the resource. Limits should be based on calculations of a carrying capacity, and should not ban all use within a region unless there is proven evidence that the activity will *directly* degrade the environment in a significant manner.

Whitewater boating, either by kayak, canoe, or other appropriate craft is equivalent to other non-motorized activities such as hiking, climbing, fishing, and horseback riding. However, whitewater recreation leaves smaller ephemeral resource "footprints" on the environment than these other activities. Therefore, recognizing certain environmental and political considerations, American Whitewater recommends opening limited access to whitewater recreationists in Yellowstone.

Specifically, American Whitewater has examined each of the 18 rivers that were included in the 1988 assessment and recommend that the Park open the Black Canyon of the Yellowstone, Gardner River Canyon, Lamar River, and Lewis River for whitewater recreation in 1999. Obtaining legal access to the Black Canyon is American Whitewater's highest priority.

Significantly, we have not recommended opening the Firehole River Segment despite the fact that it is one of the most unique whitewater rivers in North America. Our decision is based on resource concerns for archaeological sites, and discussions with our members regarding possible impacts to its unique geothermal features. However, we have included an evaluation of this river as a contrast to the other rivers in our proposal.

We have included brief descriptions of the rivers that we recommend opening on the following pages. This discussion is followed by a brief summary of recommendations to:

- Establish a Registration System and Monitor Use
- Set Equitable Use Limits
- Require Permits
- Issue Backcountry Exploratory Permits
- Conduct a New Assessment of Whitewater Recreation

*"The man in the woods
matches himself against
the forces of nature."*

Confronting wilderness
*"is a test, a measuring of
strength, a proving of his
essential pluck and
resourcefulness and
manhood, an assurance
of man's highest potency,
the ability to endure and
to take care of himself."*

▶ Stewart Edward White
(1903)

- Collect Whitewater Use Data for Five Years
- Perform Backcountry Rescues Using Existing Resources
- Construct No New Facilities Specifically for Whitewater Users
- Establish a Citizen's River Advisory Panel



Black Canyon of the Yellowstone

Length: 23.2 miles from Tower bridge to Gardiner/North Boundary
Season: Late summer, August 1st to October 15th
Description: Class V, medium volume river

This run offers incredible whitewater with a spectacularly scenic backcountry experience. Put-in and take-out access points already exist at Tower Bridge and Gardiner. A trail parallels the river for its entire length. Numerous tributaries, including Slough Creek and Hellroaring Creek, which flow out of the bordering Absaroka-Beartooth Wilderness Area to the North, add to its volume. Knowles Falls, a 15-foot Class V rapid, is one of many exceptional rapids. There are columnar basalt formations, coniferous forests, sandy beaches, and talus slopes throughout the canyon. The last three miles of the river, before Gardiner, pass through an arid, desert-like region. This stretch can be run in a day and has been the subject of several American Whitewater Journal articles. *Opening this stretch is of highest importance to our members.*

Recommendation: American Whitewater recommends evaluating and opening the Black Canyon of the Yellowstone from Tower Junction to the Park boundary in Gardiner, Montana in the summer of 1999.

Justification: Our membership has indicated that the Black Canyon of the Yellowstone is the most desired run within Yellowstone National Park. Access points for the Black Canyon of the Yellowstone would have no impact on Park resources beyond existing uses. The put-in and take-out for the Black Canyon already exist and would not require additional development. The put-in at Tower Junction has developed parking areas and an access trail to the river. The take-out is outside the Park's boundaries. Portage routes around rapids utilize the river substrate below the high water mark without damaging the resource. Riparian vegetation is not present in portage locations due to the annual inundation and erosive forces of high water.

Visual impacts for other Park users are minimal within the Black Canyon. The Black Canyon is restricted from view along the highway between Tower Junction and Gardiner with two exceptions. These exceptions are the Highway 89 Bridge, which is outside of the Park boundary in the town of Gardiner, and the Tower Junction bridge. Both of these locations already present visitors with non-wilderness views. The former due to urban development, and the latter as the result of concentrating human activity on the highway and pull-out area. As stated in the Park's assessment, contact with hikers, anglers, and packers would be limited because the trail paralleling the river from Tower Junction to Gardiner receives minimal use during the summer due to high temperatures.

Spring is the most sensitive time of year for wildlife species in Yellowstone. Paddlers would not generally choose to float the Black Canyon during this season because of the high flows that make this stretch considerably more difficult. Limiting boating opportunities seasonally would eliminate wildlife impacts during this critical period. Likewise use can be limited seasonally based on concerns for raptors.

Gardner River Canyon

Length: 5 miles from Boiling River to the confluence with the Yellowstone River, outside of the Park in Gardiner, Montana
Season: Spring and early Summer, or after heavy rains
Description: Class III-V creek, depending on flows

This is a roadside run with excellent access points. The put-in is near the 45th parallel and is also near the trailhead for the short upstream hike to Boiling River, which is a well-known hot springs. The Boiling River is one of the few places where people can legally swim in Yellowstone's natural hot springs. The trailhead has a parking lot and a sanitation facility. During most periods of sufficient water for boating, the hot springs are closed. This eliminates concerns for overcrowding in the parking lot, and the potential for user conflicts. The river follows the North Entrance Road and runs through spectacular volcanic formations. Boaters can take out at the river's confluence with the Yellowstone in Gardiner, Montana. This stretch can be run in a day.

Recommendation: American Whitewater recommends evaluating and opening the Gardner River Canyon for whitewater recreation from Boiling River to the confluence with the Yellowstone River in 1999.

Justification: Like the Black Canyon, existing access points preclude the need for additional development, causing no impacts to Park resources beyond existing uses. The put-in at Boiling River has a developed parking lot and access trail to the river. The take-out is located beyond the Park boundary in Gardiner, MT.

If needed, portage routes around hazardous rapids in specific, identifiable locations utilizing the river substrate without damaging the resource. Riparian vegetation is not present in these locations due to annual inundation and the erosive forces of high water.

Contact with other users would be very limited, as this river would receive limited use due to its difficulty. Use would be further limited to periods of high water, which corresponds to times when the Boiling River is generally closed to swimmers.

Boating opportunities should be precluded during critical wildlife breeding periods.

American Whitewater supports opening this river segment for limited use, dependent upon concerns for resource protection and wildlife breeding seasons.

Lamar River

Length: 6 miles from Lamar Canyon to the confluence with the Yellowstone River
Season: Spring and early Summer, or after heavy rain
Description: Class V(+) canyon (0.1 miles) emerging into a small Class II+ river

The Lamar River exits the Lamar Valley and enters the steep-walled Lamar Canyon where it drops significantly through a series of extreme rapids with large boulders and big hydraulics for a tenth of a mile. Some of the oldest rocks in Yellowstone National Park are exposed along the riverbanks. These rocks substantially predate the recent volcanic activity that affected the majority of the Park's topography. As the river re-emerges from the canyon, it winds through boulder-strewn, Class II(+) whitewater for 5.9 miles to the junction with the Yellowstone River. Intermediate boaters can run this lower stretch in a day; it is uncertain whether the top stretch can be run at all.

Recommendation: American Whitewater recommends evaluating and opening the lower portion of the Lamar River Canyon to the confluence with the Yellowstone River for whitewater recreation in "hard-shell" boats (canoes and kayaks).

Justification: Like the Black Canyon, existing access points preclude the need for any additional development, thereby causing no impact to Park resources beyond existing uses. The Northeast Entrance Road parallels the canyon providing good access. Boaters can take out at Baronette Bridge, a short distance downstream from the Tower Bridge put-in on the Yellowstone, or continue down river through the Black Canyon of the Yellowstone.

Intermediate boaters can portage the first tenth of a mile along the road without damaging the resource. Due to the relative lack of difficulty on the Lamar, boaters would not need to portage any rapids, and would remain within the normal high water mark at most water levels.

Visual impacts for other Park users are likely to be greater than within the Black Canyon as much of the run parallels a road. However, adhering to a wilderness standard on the Lamar hardly seems justifiable considering the impacts associated with automotive use in this canyon.

American Whitewater supports opening this river segment between May and early July during periods of relatively high water. This recommendation is dependent upon concerns for resource protection and limiting use during critical wildlife breeding seasons.

Lewis River

Length: 14 miles from Lewis Lake Outlet to the South Entrance
Season: Spring and early Summer
Description: Small Class III (V) river

The Lewis River begins at the outlet of Shoshone Lake in the south-central portion of the Park. It flows 4.5 miles south into Lewis Lake; this short stretch is known as the Lewis River Channel and is the only river segment in the park where boating is permitted. The river re-emerges at the southern tip of Lewis Lake where boating is banned.

The river rushes out of Lewis Lake through several rapids before plunging 30 feet over the Class V-VI Lewis Falls; this waterfall will require establishment of a regular portage route. The Falls is followed by a series of moderately difficult Class III rapids for the next 7.6 miles through a steep-walled canyon which is bounded by adjacent ash flow tuffs from Yellowstone's caldera-forming activity. The river parallels the South Entrance Road, although once in the canyon, it is far below road height. The last 1.3 miles of the Lewis River is fast-flowing until it empties into the Snake River near the Park's South entrance. This trip is an ideal Class III wilderness run and can be completed in a day.



Recommendation: American Whitewater recommends evaluating and opening the Lewis River for whitewater recreation from the Lewis Lake outlet to the South Entrance in 1999.

Justification: Existing access points preclude the need for any additional development, thereby causing no impact to Park resources beyond existing uses. The put-in at Lewis Lake actually has an existing boat launch area, developed parking lot, and access trail to the river. The take-out is near the Park boundary by the South Gate.

A short portage route (such as a rough dirt trail) would need to be established around Lewis Falls. Otherwise boaters can scout and portage rapids on this river within the high water mark and without damaging the resource.

Visual impacts and contact with other Park users would be minimal. This river would receive use in the Spring and after periods of heavy rain. Running the Lewis River is dependent upon relatively high water.

American Whitewater supports opening this river segment for limited use, dependent upon concerns for resource protection and wildlife breeding seasons.

Firehole River Canyon (not recommended for use)

Length: 4 miles
Season: Spring and Summer
Description: Class V creek

The Firehole is a tributary of the Madison River. Its confluence with the Gibbon River forms the Madison near the West entrance of Yellowstone National Park. Four miles South of its confluence with the Gibbon, the Firehole enters an 800-foot canyon formed by rhyolite lava flows and surrounded by lodgepole pine forests. The canyon contains numerous rapids, including two substantial Class V drops which might require portaging. The 39-foot Firehole Falls is a vertical drop of 25 feet with a hydraulic at the base; this rapid flows into a series of drops called the Firehole Cascades. Once an Indian trail, the Firehole Canyon Road parallels the run for two miles, providing great access. The Firehole's unique geothermal characteristics cannot be found on, or compared to, any other river in North America. The opportunities that are available on the Firehole are absolutely unique to Yellowstone.

Recommendation: American Whitewater recommends conducting an evaluation of the Firehole River Canyon for whitewater recreation. This river has numerous geothermal features and archaeological sites; therefore ***we do not recommend opening this run without a full review*** of the possible impacts to the resource from whitewater recreation. However, this river segment might be considered for limited seasonal use during periods of relatively high water from the lower basin to the confluence with the Madison. ***A use analysis should focus on impacts that are specific to whitewater recreation rather than swimming, fishing, hiking, or other activities that are already permitted in this canyon.***

Justification: The Firehole Canyon already has excellent access points, which would not require any additional development, and whitewater recreation would have minimal impact on Park resources. The put-in has a well-developed parking lot and excellent access trail to the river. The take-out is beside Firehouse Canyon Road. Absolutely no new facilities are required. Use on the Firehole can be easily managed. There is already a well-developed system in place for managing use in the riparian corridor. Portaging within the normal high water mark is unlikely to damage the resource.

There are well-defined restrictions regarding the sensitive geothermal features, fishing, swimming, and wading in the river. Whitewater recreation is unlikely to create impacts to the resource beyond those of existing uses. This river contains difficult whitewater; therefore the ***use of the river will be self-limiting and is unlikely to receive an unacceptable level of use.*** Whitewater recreation on the Firehole is unlikely to result in user conflicts or visual impacts. Whitewater boating on this river is naturally limited by fluctuating water levels to periods of high water when the river is closed to other users, or seasons when the Park receives little visitation or use of this resource. Wildlife impacts should also be examined and considered prior to opening this river for general recreational use.

Recommendations

Establish a Registration System and Monitor Use: The difficulty in addressing the management issues of whitewater boating on Yellowstone's Rivers is that there is no reliable data on use. This makes it difficult to anticipate use levels and resource impacts. Therefore, American Whitewater recommends opening the rivers in Yellowstone and utilizing a mandatory registration system for accurately tracking and monitoring use of the resource.

Set Equitable Use Limits: Whitewater boating should be treated equally with other recreational activities. American Whitewater believes that the rivers in the Park should be open for use, just as other areas of the Park are open to hiking and other recreational activities.¹ If use limitations are appropriate for specific areas (because of resource concerns such as risk to wildlife, sensitive geothermal features, etc.), these limitations should be applied to all recreational activities in the area, which is the only effective way of adequately protecting a natural resource. Concerns for cumulative use impacts from whitewater boating or other activities can be avoided through the implementation of appropriate management strategies such as limiting use seasonally to specific river segments in the Park.



American Whitewater accepts that there may be a need for setting reasonable use limits in Yellowstone, and has no objections to such restrictions if the Park Service has 1) reasonable scientific justifications for imposing restrictions, 2) if the restrictions do not arbitrarily discriminate against whitewater boating, 3) if whitewater boaters are consulted and included as a part of any studies examining whitewater recreation. Use restrictions should only be imposed if a need arises which can not be addressed through education or the enforcement of existing regulations.

Require Permits: Permits are required for backcountry camping and fishing. A similar permit could be used for rivers, combined with a liability waiver, and a waiver of rescue. This would allow the National Park Service to collect use data, and provide an opportunity to offer users additional information concerning safety or resource considerations in the Park. American Whitewater will assist Park staff with developing a permit design, providing information about rapids, and alerting the whitewater

¹ When snowmobiles were first allowed in the Park, they were given unlimited access to all the roads in the Park. After snowmobiling had become entrenched, the Park prepared a management plan to guide this use, began a study of its impacts, and contemplated use restrictions. Currently there are approximately 300 miles of groomed snowmobile trails inside Yellowstone, and nearly 1,200 miles of hiking trails.

community about permits and other regulations regarding whitewater boating in Yellowstone. Daily limits on the number of permits could be established at a later date if significant resource protection problems arise.

Issue Exploratory Permits: Yellowstone has more than 2,300 miles of rivers and streams, the majority of which have never been explored by contemporary river-based expeditions. Currently, whitewater explorers and adventurers have to travel as far as Mexico, Canada, or South America for an equivalent backcountry wilderness experience. Yellowstone National Park should consider issuing a limited number of exploratory permits (5-10) each year for multi-day, exploratory, backcountry use. Consideration for these permits could be restricted based on wildlife and resource concerns.

American Whitewater can assist in developing this permit system, establishing a system for recording information about these tributaries, and ensuring that only qualified boaters receive these permits and are aware of the risks that are involved in traveling in the backcountry. Regardless, the Park should conduct a survey of the whitewater resources in the backcountry and American Whitewater asks to assist in conducting this survey.

“Much of the whitewater of Yellowstone is virtually undiscovered and difficult to evaluate. Why not eliminate the irrational ban on boating in the Park, and truly evaluate the many miles of boatable whitewater by boating them? Experience is a much better teacher than imagination.”

-Ron Ladders, boater and co-author of *Western Whitewater*

Conduct a New Assessment of Whitewater Recreation: The Park Service should develop and conduct a new, peer-reviewed, inventory and monitoring program of the Park's whitewater resources as suggested in the Backcountry Plan (p. 85) in order to answer, "how use affects resources or on how user groups affect each other." In the event that Yellowstone National Park elects to revisit the environmental parameters which were evaluated in the 1988 Assessment with more contemporary data, then ***American Whitewater requests the opportunity for providing input on the proposed study design, and inclusion in the study process itself.*** American Whitewater has expertise in designing and implementing whitewater feasibility studies with state and federal agencies as well as the private sector (see Appendix VI). Each of the 18 rivers evaluated in the 1988 Assessment should be evaluated independently of one another in such a study. Likewise, the survey should include individual assessments of many of Yellowstone's creeks that are suitable or capable of supporting whitewater boating. These assessments must be based on scientific studies rather than speculation.

Collect Whitewater Use Data for Five Years: American Whitewater recommends that the Park open the four river segments described above and conduct studies of resource impacts from boating over a reasonable period of 5-years. During its initial two years of implementation, we recommend requiring that boaters obtain a backcountry day use permit from Yellowstone National Park (similar to that obtained by overnight hikers). This permit system would allow Yellowstone National Park to monitor user days, participant age, sex, and residence. Boater use in the Black Canyon could be evaluated at the conclusion of the third year to determine whether a daily limit needs to be implemented the following year.

Backcountry Rescue: Whitewater boaters should be treated consistently with other recreational users of the Park such as hikers and climbers. If Park policies require insurance or that all backcountry users sign a waiver of rescue or liability releases, then boaters would certainly be regulated similarly. However, there is no justification that whitewater boaters should be treated any differently than other users when it comes to using the Park's backcountry resources for recreation.

Educate Backcountry Users: Signs and pamphlets discussing the rules and regulations in Yellowstone's backcountry are beneficial. These educational tools can be developed and distributed under existing Park programs and posted at established access points. American Whitewater has experience in developing safety signs on other rivers. We would be happy to assist the Park in designing and placing signs in Yellowstone.

Construct No New Facilities Specifically for Whitewater Users: Whitewater boating does not necessitate an immediate need for the construction of any new facilities. Boaters can use existing trails, parking areas, and restrooms. Yellowstone National Park could limit access to designated points on the rivers to prevent degradation. As noted earlier in this proposal, most portages are conducted below the high water mark where they would have no impact, so few portage trails would need to be constructed. American Whitewater has experience preparing these types of trails for boaters. For example, in Tallulah Gorge (GA) we donated volunteer labor and established a specially designed trail to protect endangered plant species; on the Blackwater River (WV), volunteers built parking and changing areas; and on the Watauga River (TN), volunteers built a trail, parking, and changing screen.



Establish a Citizen's River Advisory Panel: Clearly, there is work that needs to be done in delineating the details of boating in Yellowstone. American Whitewater will work with the National Park Service to establish a council with representatives from the whitewater community and Park management to resolve issues related to providing access to Yellowstone's rivers.

Many other Parks have established similar panels and groups. For example, Grand Canyon National Park had a "Constituency Panel" of river users for many years and has recently established several work groups to examine the Colorado River Management Plan. American Whitewater's Access Director is providing services as a co-captain of one of these groups for the Park.

These councils, panels, and groups provide valuable feedback to each Park and make suggestions regarding resource management.



A Yellowstone Citizen's Panel could help to determine which river segments could be opened, how they could be used, and when they might be accessed. American Whitewater asks to be included in an advisory position on this panel.

Summary

Despite the National Park Service's concerns over an increased human presence in Yellowstone, and the associated cumulative recreational impacts on wildlife, American Whitewater offers this limited proposal for opening four river segments for non-commercial whitewater recreation.

There are numerous examples of whitewater use within America's other National Parks and public lands that contain sensitive resources. These other Parks allow and successfully manage whitewater boating and multiple use groups. There is no reason why Yellowstone cannot also manage the Park's resources effectively and allow limited whitewater recreation.

Referring to the Black Canyon of the Yellowstone, the Park's 1988 Assessment states that:

"The river is suitable for whitewater boats... The potential is high here for a scenic, backcountry whitewater experience."



Proposed Schedule of Events

American Whitewater proposes that the National Park Service agree to work in cooperation with our organization on the following schedule to examine whitewater recreation on Yellowstone's rivers and streams.

- November 15, 1998 American Whitewater submits proposal to open select rivers in Yellowstone National Park to whitewater recreation.
- December 1998 American Whitewater's staff meet with Yellowstone National Park's Superintendent to discuss proposal.
- January 16, 1998 Hold meeting establishing a Yellowstone Citizen's River Advisory Panel to examine whitewater recreation in the Park. This group should meet annually to examine boating on Yellowstone's rivers.
- February 1, 1999 Citizen's Panel submits the first annual report (5-10 pages) evaluating whitewater recreation in the Park.
- March 1, 1999 American Whitewater requests a decision from the Superintendent permitting whitewater recreation in the Park (and particularly on the Black Canyon of the Yellowstone) in August, 1999.
- August 1, 1999 Open Black Canyon and other river(s) to whitewater recreation, begin data collection and surveys of resource impacts.
- March 1, 2000 Decision from the Superintendent regarding permits for multi-day, backcountry exploration, and any modifications in access.
- October 15, 2001 Begin analysis of the first three years of whitewater recreation.
- October 15, 2002 Submit report (5-10 pages) summarizing impacts and use during the first three years of whitewater recreation in Yellowstone.
- October 15, 2004 Begin analysis of the first five years of data on whitewater recreation in Yellowstone National Park.
- January 15, 2005 Complete analysis and submit report (20-30 pages) summarizing impacts and use during the first five years of whitewater recreation.
- March 1, 2005 After consulting with the Citizen's Advisory Council, Superintendent makes decisions regarding season lengths, permits, and rivers, which are acceptable for whitewater recreation and boating use in Yellowstone National Park.