



www.americanwhitewater.org

Kevin Colburn
National Stewardship Director
2725 Highland Drive
Missoula, MT 59802
406-543-1802
kevin@americanwhitewater.org

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Re: National Park Wild and Scenic River Management Planning

Dear National Park Service Planning Staff,

American Whitewater would like to thank National Park Service staff for the opportunity to provide these comments on the draft Outstanding Remarkable Values (ORV's) as well as the development of a Comprehensive River Management Plan (CRMP) for the newly designated Wild and Scenic Rivers in Yellowstone and Grand Teton National Parks (hereinafter referred to as the "GT&Y Parks"). American Whitewater board member Aaron Pruzan was deeply involved in the creation of the Craig Thomas Snake Headwaters Legacy Act, and our organization actively supported the Act's passage as part of the 2009 Omnibus Public Lands Act. American Whitewater and the conservation-oriented paddlers that we represent are very pleased to have played a role in these rivers' permanent protection, and in the public recognition of their spectacular values through the Wild and Scenic Rivers Act. We look forward to working with the National Park Service and the public in developing protective and nationally consistent management plans for these rivers.

Canoeing, kayaking and rafting are likely the oldest forms of travel and exploration aside from walking. Though technological advances have improved safety (as in all outdoor recreation) the core elements of the activity remain; exploring natural areas by paddling a small boat through the landscape on rivers. Each river is a natural trail through the landscape, reflecting the character of the geology and natural beauty. Paddling is human-powered, place-based, low-impact, quiet, non-consumptive, skill-based, and Wilderness-compliant. In short, it is exactly the kind of activity and experience that the Park system was created to foster.

Like all outdoor recreational activities, paddlers exist on a spectrum of skill and commitment ranging from the casual participant to the dedicated enthusiast. GT&Y Parks have something for everyone, from a short whitewater adventure on the Gros Ventre or the Lewis to an exploratory and scenic multi-day adventure down the Upper Snake. Regardless of the difficulty of the rapids and canyons, the core element of paddling is experiencing a place through interaction with moving water, moving with the natural flow and experiencing the landscape from the river's perspective. Rivers are an integral part of the geology and ecology of the Parks. Their beauty, energy, and motion, combined with the scenery of the canyons and mountain ranges they flow through, offer Americans an incomparable paddling experience unique to GT&Y Parks. We ask that you value this experience equally with the experiences sought by other Park visitors.

1. Recreational Management Context

a. America's Great Outdoors Initiative

President Obama recognized, earlier this year that:

[Americans] are losing touch with too many of the places and proud traditions that have helped to make America special...Families are spending less time together enjoying their natural surroundings... and we are losing our connection to the parks, wild places, and open spaces we grew up with and cherish. Children, especially, are spending less time outside running and playing, fishing and hunting, and connecting to the outdoors just down the street or outside of town.

In response to these concerns, President Obama launched the America's Great Outdoors Initiative. The first goal of the initiative is to:

Reconnect Americans, especially children, to America's rivers and waterways, landscapes of national significance, ranches, farms and forests, great parks, and coasts and beaches...

There is no better way to reconnect Americans to rivers and wild places than to foster their ability to explore in kayaks, canoes, and rafts. Certainly paddling a river through a National Park offers Americans a powerful nature-based experience. Witnessing others exploring rivers will inspire more casual land-based tourists – adults and kids alike - to search out paddling instruction and experiences in their home watersheds. Paddling is a great activity for kids, who may have a hard time keeping up and staying entertained on long hikes, but also need a stimulating activity to keep them engaged. Paddling is fun, something of great value and interest to youth.

In the development of CRMP's for GT&Y rivers we ask that the NPS consider supporting paddling experiences in the Parks in the context of the America's Great Outdoors Initiative. We feel that the direction offered by the President is relevant, timely, and extremely important.

b. Wild and Scenic Rivers Act

Paddling is allowed and fully supported on the Nation's over 200 Wild and Scenic Rivers as a general rule. Section 1281 of the Wild and Scenic Rivers Act (WSRA) is the general basis for this policy, which provides in relevant part:

Each component of the national wild and scenic rivers system shall be administered in such manner as to protect and enhance the values which caused it to be included in said system without, insofar as is consistent therewith, limiting other uses that do not substantially interfere with public use and enjoyment of these values. 16 U.S.C. § 1281(a).

In many cases paddling is recognized as an ORV, or as an integral component of a more general “recreation” ORV. On these rivers paddling is protected and enhanced under the first part of Section 1281. On Wild and Scenic Rivers where paddling is not specifically recognized as an ORV, agencies support paddling because paddling does not “substantially interfere” with public enjoyment of rivers. Far from substantially interfering, paddling itself is a powerful means for the public to use and enjoy Wild and Scenic Rivers. On these rivers paddling is protected and enhanced under the second part of Section 1281. For these reasons the public is generally encouraged to enjoy Wild and Scenic Rivers in canoes, kayaks and rafts.

c. National Park Service Context

The preamble to the *Use of the Parks* chapter of the 2006 NPS Management Policies document states:

National parks belong to all Americans, and the National Park Service will welcome all Americans to experience their parks. The Service will focus special attention on visitor enjoyment of the parks while recognizing that the NPS mission is to conserve unimpaired each park’s natural and cultural resources and values for the enjoyment, education, and inspiration of present and future generations.

Parks are managed based on a tiered system of authorities including the Organic Act, the Management Policies document cited above, the enabling legislation for the specific park, general regulations, Executive Orders, Directors Orders, and Superintendent Compendiums. Decisions on which uses to allow or prohibit in Parks are based on a combination of the above.

The Organic Act mirrors the quote above voicing a dual mission of preservation and public enjoyment. Regarding recreation, the enabling legislation for Yellowstone National Park simply states that the region be “dedicated and set apart as a public park or pleasuring-ground for the benefit and enjoyment of the people.” It is the Management Policies document that offers the most guidance on specific recreational uses. This document focuses on the concept of “appropriate uses”:

The concept of appropriate use is especially important with regard to visitor enjoyment because, in accordance with the Organic Act, the fundamental purpose of all parks also includes providing for the enjoyment of park resources and values by present and future generations. The scope of enjoyment contemplated by the Organic Act is described in section 1.4.3. Appropriate forms of visitor enjoyment emphasize appropriate recreation consistent with the protection of the park. This includes interpretation of park resources and contemplation and understanding of the purposes for which a park unit’s resources are being preserved. Many of these forms of enjoyment support the federal policy of promoting the health and personal fitness of the general public, as set forth in Executive Order 13266 (Activities to Promote Personal Fitness). (2006 Management Policies, 8.1.1 Appropriate Use)

Additional guidance can be found in Section 1.5 of the same document:

Appropriate visitor enjoyment is often associated with the inspirational qualities of the parks. As a general matter, preferred forms of enjoyment are those that are uniquely suited to the superlative natural and cultural resources found in the parks and that (1) foster an understanding of and appreciation for park resources and values, or (2) promote enjoyment through a direct association with, interaction with, or relation to park resources. These preferred forms of use contribute to the personal growth and well-being of visitors by taking advantage of the inherent educational value of parks. Equally important, many appropriate uses also contribute to the health and personal fitness of park visitors. (2006 Management Policies, 1.5)

Section 8.1.2 continues:

To provide for enjoyment of the parks, the National Park Service will encourage visitor activities that: are appropriate to the purpose for which the park was established; and are inspirational, educational, or healthful, and otherwise appropriate to the park environment; and will foster an understanding of and appreciation for park resources and values, or will promote enjoyment through a direct association with, interaction with, or relation to park resources; and can be sustained without causing unacceptable impacts to park resources or values.

Paddling rivers in canoes, kayaks, and suitable rafts in GT&Y meet and exceed these standards that define “appropriate uses.”

- Paddling is consistent with the purposes of the Parks – which include human powered outdoor recreation.
- Paddling is consistent with the protection of the Parks. It is the lowest impact manner to explore the Parks. Visitors do not generally require trails or other infrastructure, and move relatively quickly through an area without a trace.
- Paddling fosters an understanding of and appreciation for park resources and values through providing immersive interactions with the Parks’ water, geology, and scenery. Through no other reasonable means can one come to understand and appreciate the rivers and river-created-landforms of the Parks so thoroughly.
- Paddling absolutely promotes enjoyment through a direct association with, interaction with, or relation to park resources. As stated previously paddling is a fully immersive experience, allowing the visitor to feel the power of the Parks’ rivers as they move through highly scenic areas.
- Paddling contributes to the personal growth and well-being of visitors by taking advantage of the inherent educational value of parks. Few could argue that a day spent floating down a Wild and Scenic River in a National Park would not provide personal growth – it would be the experience of a lifetime. Rivers are

- also spectacular natural classrooms in which to learn about geology, hydrology, and ecology.
- Paddling contributes to the health and personal fitness of park visitors. Like hiking, paddling offers a physically challenging human-powered means of exploring the Parks.

For these reasons paddling is overwhelmingly supported by the National Park Service across the Country. Enjoyment of rivers in kayaks and canoes is prohibited in only 3 parks out of 393 units of the National Park System. Only Yellowstone, Grand Teton, and Yosemite National Parks prohibit paddling on the vast majority of the rivers they manage.¹ Yosemite is currently revising their CRMP for the Wild and Scenic Tuolumne and Merced rivers. While conducting their Visitor Capacity Analysis, they are formally analyzing paddlers among the mix of other river visitors. For a wide array of legal, regulatory, and public interest reasons, it is likely that Yosemite National Park will begin welcoming the public to explore and experience their rivers in canoes, kayaks, and inflatable river craft as a result of the Wild and Scenic River CRMP process. Thus, while all other national parks support paddling as a wilderness-compliant form of place-based outdoor recreation that is integral to their mission, Grand Teton and Yellowstone are alone in prohibiting paddling.

d. Regional Recreation Context

The only rivers on which paddling is prohibited in the states of Wyoming, Montana, or Idaho are the rivers of Yellowstone and Grand Teton National Parks. State river access laws and the management direction of the US Forest Service and the Bureau of Land Management support paddling. Thus, the only rivers in the region that the public cannot legally float are in the GT&Y Parks. Significantly, GT&Y Parks comprise a huge area near places like Bozeman, MT and Jackson, WY where Americans travel on vacation but where Americans also live and work. GT&Y Parks also hold some of the best rivers in the Northern Rockies and West – stunning resources denied to the public. For many people who deeply value outdoor recreation and the landscapes in which they recreate, GT&Y Parks are their back yards. The management of the Parks' rivers has a huge impact on this group of individuals.

e. Tourism and Economic Context

Most gateway communities and regions benefit, albeit slightly, from the paddling opportunities provided in National Parks. Paddling management decisions in GT&Y Parks certainly have an effect on the paddling related businesses in the region, as well as the broader tourism markets.

f. Current Yellowstone and Grand Teton Management

Yellowstone and Grand Teton prohibit the public from enjoying the rivers in their boundaries in kayaks, canoes, and rafts with the exceptions of certain sections of the

¹ Grand Teton allows paddling only on the Snake River, Yellowstone only on certain sections of the Snake and Lewis rivers, and Yosemite only on certain sections of the Merced.

Snake and Lewis rivers. At the same time we are unaware of capacity limits in river corridors on other forms of day-use recreation which include angling, hiking, swimming, rock climbing, skiing, and even driving. As far as we know overnight capacities for other uses are based on campsite reservations rather than actual use limits. This paddling prohibition is highly unusual and severely impacts members of the public that connect with nature and special landscapes primarily and most strongly through paddling rivers.

In short, GT&Y Parks maintain an extremely unusual prohibition of paddling that is inconsistent with the management of other parks, other wild and scenic rivers, and other rivers in the region.

2. Defining Outstanding Remarkable Values

a. Rivers on Which Paddling is Currently Allowed

Paddling is currently allowed on the Lewis River between Lewis and Shoshone lakes (YNP) and the Snake River between YNP and Jackson Lake (JDRMPW) and below Jackson Lake (GTNP). The scoping document specifically recognizes paddling as an ORV for each of these river reaches. We fully agree with this assessment. The paddling opportunities provided by these reaches are undeniably outstanding and remarkable.

b. Rivers on Which Paddling is Currently Prohibited

The artificial prohibition on paddling most of the Wild and Scenic Rivers currently being analyzed makes describing the paddling ORV's uniquely challenging. With this said, it is not impossible. Countless people have toured GT&Y Parks and dreamed of what it would be like to paddle the rapids, float around the last visible bend downstream, and gaze up at towering cliffs and mountains as they drift along. A mix of firsthand scouting on foot, satellite imagery, and basic geographical information are enough to clearly prove that paddling the rivers in question would be a nationally and/or regionally significant and unique experience.

The scoping document recognizes that on the rivers on which floating is not prohibited, floating is an ORV. The scoping document also recognizes that other forms of recreation merit an ORV on these and other reaches. Perhaps then it is obvious that paddling down a superbly floatable Wild and Scenic River, through the geology, ecology, and scenery of GT&Y Parks would truly be an outstanding and remarkable experience. Thus, while no boat has legally floated some of these rivers in recent history, the rivers still undeniably possess outstanding and remarkable value as paddling resources.

We have collected information on the rivers' paddling values and are happy to contribute this information to the process.

- **Snake River, Headwaters to Heart River, Class III+(V):** Above the confluence with the Heart River the Snake River contains one challenging gorge set in a river that is more characteristically Class III. If it were not prohibited, paddling this reach would offer paddlers an even more remote and adventurous trip than just

paddling the reach immediately downstream. Access would be the kind of challenge exemplified by Wilderness travel and exploration. Any exploration of the headwaters would include paddling out on the section below Heart River.

- **Snake River, Heart River to Lewis River, 19 Miles, Class III:** The Wild and Scenic Upper Snake River below Heart River features spectacular scenery and moderate Class III rapids in an extremely remote canyon. If it were not prohibited, this section of the Snake River would provide an incredible and unique multi-day backcountry paddling trip for those willing to hike into Heart Lake, then paddle to and down the Heart River, and then paddle out on the Snake River.
- **Lewis River Canyon: 14 miles, Class III-V:** The Wild and Scenic Lewis River flows from Lewis Lake through several small rapids before cascading over the Class V+ Lewis River Falls. Paddlers would typically put in below the Falls at the main road crossing. Following the falls the run consists of primarily Class III rapids with two bigger drops/rapids near the middle of the run that are likely Class IV or V. As you would expect the scenery, water quality, and paddling experience are all very high quality. While the road roughly parallels the river, it is seldom in view because the river is set in an ash and rock canyon far below. The take out would be near the South Entrance to the Park. Paddling would be an incomparable way to explore and experience the Lewis River.
- **Buffalo Fork: 20 miles, Class II:** The Wild and Scenic Buffalo Fork boasts 20 incredibly scenic miles of meandering river. The river offers stunning views of the Tetons, easy access, and mild paddling challenge. If it were not prohibited, it would offer a spectacular float trip for the canoeist or kayaker.
- **Gros Ventre River: 5 miles, Class II-IV:** The Wild and Scenic Gros Ventre River below Slide Lake is a classic, convenient, and fairly popular whitewater run for Jackson area residents and visitors alike. Paddling is prohibited by Grand Teton National Park on the lower half of this run, beginning at the Park boundary. Below the Park boundary rapids continue upstream of Kelly. Below Kelly the river appears to offer a scenic float trip to the Snake River.
- **Pacific Creek: 10.7 miles, Class II:** Wild and Scenic Pacific Creek from the trailhead at the road terminus to the Pacific Creek river access area on the Snake River is a ten mile extremely scenic river reach. The run is characterized by an open meandering river channel with frequent and stunning views of the Teton Mountains. If legal, it would offer an incomparable paddling experience available to a wide range of paddlers for the short high-water season during which it is runnable.

The paddling experiences provided by each of these rivers would stand up against comparisons against any other Wild and Scenic river in the nation for various reasons. Pacific Creek and the Buffalo Fork would offer spectacular scenery for a wide range of paddlers, whereas the Gros Ventre appeals more to whitewater paddlers. The Upper

Snake offers paddlers the physical and logistical challenges as well as countless rewards of an expedition while not requiring advanced whitewater skills. Lastly, the Lewis offers whitewater paddlers a chance to explore a moderately challenging yet incredibly scenic and geologically interesting canyon. Each in their own unique way, these rivers have something very special to offer the paddling public. We ask that GT&Y Parks formally consider defining paddling as an ORV for each of the above mentioned river reaches.

3. Visitor Capacity Analysis:

The *National Wild and Scenic Rivers System; Final Revised Guidelines for Eligibility, Classification and Management of River Areas* (the “Secretarial Guidelines”) addressed user carrying capacity. 47 Fed. Reg. 39,454 (Sept. 7, 1982). The Secretarial Guidelines define “carrying capacity,” as “[t]he quantity of recreation use which an area can sustain without adverse impact on the [ORVs] and free flowing character of the river area, the quality of recreation experience, and public health and safety.” *Id.* at 39,455. The Secretarial Guidelines state that:

“[s]tudies will be made during preparation of the management plan and periodically thereafter to determine the quantity and mixture of recreation and other public use which can be permitted without adverse impact on the resource values of the river area. Management of the river area can then be planned accordingly.” *Id.* at 39,459.

In a related court case, *Friends of Yosemite v. Kempthorne*, 520 F.3d 1024 (9th Cir. 2008), the Ninth Circuit Court of Appeals recently held that:

The Secretarial Guidelines also require that a component’s management plan state the kinds and amounts of public use which the river area can sustain without impact to the values for which it was designated[,] and specific management measures which will be used to implement the management objectives for each of the various river segments and protect esthetic, scenic, historic, archeologic and scientific features.

The GT&Y scoping newsletter proposes to precisely meet this mandate through the CRMP process. We ask that GT&Y park staff consider people paddling - non-commercially - canoes, kayaks, and inflatable river craft among the mix of river recreation uses.² We expect this process to produce specific capacities for each type of recreational use including justifications for those capacities.

The Wild and Scenic Rivers Act is fully supportive of the public experiencing rivers in kayaks, canoes, and inflatable river craft. Implementation of the Act is clearly based on a baseline of paddling occurring without direct limits on use. Independently, a capacity is set, based on substantial evidence, above which paddling is predicted or documented to substantially impact an ORV. From the baseline, managers may seek to reduce paddling

² Here and elsewhere in our comments we refer to rafts and inflatable river craft. These terms are meant to describe inflatable boats specifically designed for river travel, which include rafts, inflatable kayaks, and alpaca rafts, but is not meant to include inflatable objects not designed for river travel.

(or any other) use equitably through indirect and direct measures to ensure visitation is within the capacity of the river, if indeed capacities are exceeded or expected to be exceeded. Of the thousands of rivers on public lands, and hundreds of Wild and Scenic Rivers, very few require any limits on paddling to ensure capacities are not exceeded. None have been found to have a capacity of zero through a valid visitor capacity analysis.

Use of whitewater rivers and creeks by paddlers is naturally and often severely limited by water levels, weather, time of day, technical difficulty, physical challenge, and access. For these reasons the vast majority of whitewater rivers offer only a narrow window of suitable conditions and attract only a small number of paddlers each year. These annual and ephemeral opportunities are treasured and sought after by paddlers seeking to experience new and special places. These opportunities range from relatively commonly paddled rivers featured in guidebooks to lesser known exploratory runs. There is seldom if ever a need to manage these paddling opportunities differently than other front and backcountry recreational uses since they are generally among the smallest and lowest impact uses. Direct limits on these opportunities can needlessly eliminate rare and treasured experiences. In these comments we will refer to such rivers and creeks as “low use rivers.”

Only a small percentage of whitewater rivers offer the rare combination of co-occurring desirable qualities that create high recreational demand. These are generally larger rivers with suitable and predictable warm weather flows, easy access, and easy or moderate difficulty. Such rivers can attract enough paddlers to contribute significantly to the total or seasonal use of the river corridor, and thus may require unique and active management. In these comments we will refer to such rivers and creeks as “high use rivers.” The Middle Fork of the Salmon, Rogue, and Grand Canyon of the Colorado are examples of actively-managed high-use rivers in Forest Service Wilderness areas or National Parks.

Across all Federal lands, these two types of rivers are managed very differently from one another. Paddling on low use rivers on Federal lands is typically managed in concert with – and indistinguishable from – all other day and overnight use. In many cases this amounts to little or no active management. In other cases standard permits are required for traversing or camping in an area and there may be some minimal infrastructure created to facilitate paddling. Paddling on high use rivers on Federal lands is managed differently across such rivers based on the management goals and concerns, and also based on a set of river management practices and protocols. While too exhaustive to go into detail in these comments, the protocols generally are intended to provide for high quality experiences while protecting the river resource from significant impacts. Use limits are imposed only when deemed necessary, and are done so in an equitable and rational manner.

Based on this context, we would like to offer these specific comments on capacities and use of the river reaches in question.

a. Rivers on Which Paddling is Currently Allowed

Paddling is currently allowed on the Lewis River between Lewis and Shoshone lakes (YNP) and the Snake River between YNP and Jackson Lake (JDRMPW) and below Jackson Lake (GTNP). We expect a capacity analysis to consider paddling on these reaches among all other visitors. We also expect the NPS to continue welcoming the public to enjoy these river reaches through a capacity finding that responsibly accommodates paddling.

b. Rivers on Which Paddling is Currently Prohibited

- **Snake River: Headwaters to Heart River, and Heart River to Lewis River:** These reaches would seldom be paddled due to the immense effort required to reach the put-ins. Access would only be possible through hiking long distances with a boat and gear, which would likely limit the use to people using alpaca rafts and fit kayakers. Access would also be limited to a short summer season due to flows and snowpack. The contribution to trail, campsite, and on-river capacity would be negligible. Existing trails and ample NPS campsites are more than sufficient to support this use.
 - **Recommendation:** Manage paddling using the same permit system and capacities used for backcountry hiking and camping. Limit total use equitably if capacity is approached or exceeded.
 - **Rationale:** This policy would allow the public to seek a unique river-based adventure in the Park while integrating those few people into the existing backcountry management framework. These paddlers should be viewed as backpackers that also paddle rivers as a fundamental part of their adventures. Our recommendation would require no new management efforts or infrastructure and no new effects.
- **Lewis River Canyon:** Paddling on the Lewis River Canyon would be limited by the challenging nature of the whitewater rapids. Access would also be limited to spring and early summer months due to flows. In combination these factors would naturally create seasonal moderate demand. Existing access facilities are sufficient.
 - **Recommendation:** Manage paddling like other day-uses of the Park – through existing facilities, signage (possibly new), and general Park rules. If deemed necessary, river access areas could be designated and could provide a self-issue permitting opportunity to assist the NPS with tracking use.
 - **Rationale:** This policy would allow the public to experience a unique whitewater canyon in the Park while integrating those people into the existing day-use management framework. Use would likely be self-limiting but the ability to add a day-use self-permitting station would allow the Park to track use numbers and assess those numbers relative to estimated capacities.
- **Buffalo Fork and Pacific Creek:** Paddling use of the Buffalo Fork and Pacific Creek would be limited to a relatively short spring/summer season due to flows. The lack of rapids may limit (but not eliminate) use by whitewater boaters.

- Demand is therefore expected to be low to moderate during the short high-water period, and virtually nonexistent outside of that timeframe.
- **Recommendation:** Manage paddling like other day-uses of the Park – through existing facilities, signage (possibly new), and general Park rules. If deemed necessary, river access areas could be designated and could provide a self-issue permitting opportunity to assist the NPS with tracking use.
 - **Rationale:** This policy would allow the public to experience two spectacularly scenic rivers in the Park while integrating those people into the existing day-use management framework. Use would likely be self-limiting but the ability to add a day-use self-permitting station would allow the Park to track use numbers and assess those numbers relative to estimated capacities.
- **Gros Ventre River:** Paddling on the Gros Ventre would be limited to whitewater paddlers because of the moderate whitewater rapids. Access would also be limited to spring and early summer months due to flows. Given the relatively popular nature of the river upstream of this reach during times of adequate flow, it should be assumed that demand for the lower reach ending in Kelly is in similar demand. Demand is therefore expected to be moderate to moderately popular during the short high-water period, and virtually nonexistent outside of that timeframe. The reach downstream of Kelly may attract paddlers seeking an easy scenic or fishing trip.
 - **Recommendation:** Manage paddling like other day-uses of the Park – through existing facilities, signage (possibly new), and general Park rules. If deemed necessary, river access areas could be designated and could provide a self-issue permitting opportunity to assist the NPS with tracking use.
 - **Rationale:** This policy would allow the public to extend a relatively popular whitewater paddling experience downstream on a scenic reach with convenient access while integrating those people into the existing day-use management framework of the Park. Use would likely be self-limiting but the ability to add a day-use self-permitting station would allow the Park to track use numbers and assess those numbers relative to estimated capacities.

Regarding capacities, we ask simply that you formally consider and define the numeric paddling capacity of these rivers (under both a. and b. above), in concert with the other mix of visitors. We feel that naturally limited use will fall well below any well justified capacity, but are of course supportive of efforts to limit uses equitably when capacities are approached or exceeded. While we certainly cannot recommend what the capacities of these rivers are, we are comfortable stating that they are not zero. We firmly believe that the public can safely enjoy these rivers in canoes, kayaks, and inflatable river craft in a manner that is of equal or lesser impact than other visitors. We ask that paddling capacities and any related limits be set using the same metrics as other visitor capacities and limits, and that they be well justified with any relevant ecological and/or social data used in decision-making.

We ask that GT&Y Parks view river access in this nationally consistent context, rather than relying on the unique idiosyncratic current and past management of GT&Y Parks as a baseline for decision making. In short, please ask why, how, and if paddling should be limited, not why, how, and if it should be allowed. We ask that you consider the recommendations and concepts listed above in your user capacity analysis and your broader CRMP.

Conclusion

The above recommendations and concepts would allow park visitors to explore the parks using canoes, kayaks, and inflatable river craft in addition to the current options (hiking, skiing, climbing, motorboating, driving, horseback riding, etc.) This proposal would provide the potential for spectacular backcountry and frontcountry paddling experiences unique to GT&Y Parks for the community of people that connect with nature and special places primarily through paddling. It would make the management of paddling in a small portion of GT&Y Parks consistent with the management of virtually every other river in the Nation, and restore fairness. It would be fully consistent with overarching park objectives and mandates, as well as the Wild and Scenic Rivers Act. It would foster deep appreciation of the Park by a community of conservation-oriented visitors that are currently alienated.

Paddling rivers is a powerful and widely accepted way of experiencing National Parks and other federal lands across the country. Current management of Yellowstone and Grand Teton National Parks prohibits the public from exploring almost all of the Parks' rivers by kayak, canoe, and raft. We propose that GT&Y Parks take a fresh look at the capacity of the Wild and Scenic Rivers under their management to support a very low-impact use that fits entirely within the intent of the Parks' purpose. We propose that GT&Y Parks manage their rivers in a manner consistent with normal river management protocols and practices. Our proposal allows paddling to occur while protecting the Parks' rivers and the experiences of other Park visitors. Our proposed management is intended for consideration in the development of Comprehensive River Management Plans for the Wild and Scenic Rivers in the Parks. Thank you for analyzing these ideas, and for considering the interests of the many citizens that connect most strongly with special natural places from their kayaks, canoes, and rafts.

Sincerely,

Kevin Colburn

A handwritten signature in dark ink, appearing to read 'K. Colburn', with a stylized flourish at the end.

American Whitewater
National Stewardship Director