



**American Packrafting Association**

P.O. Box 13  
Wilson, WY 83014  
907-947-6437  
[info@packraft.org](mailto:info@packraft.org)  
[www.packraft.org](http://www.packraft.org)

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November 3, 2015

Josh Metten  
Bridger-Teton Organizer  
Wyoming Wilderness Association  
**P.O. Box 6588**  
**Sheridan, WY 82801**

Dear Josh Metten

Thank you for your and WWA's sincere interest in the paddlers' perspective on the issue of the Yellowstone and Grand Teton Paddling Act, and engaging and disagreeing respectfully. It speaks to your organization's deep, knowledgeable, and intimate connection to wild places and your understanding of the importance of connecting people to those places in low-impact kinesthetic ways. It also speaks to your organization's willingness to work with people from all viewpoints. I am proud to have served a term on the WWA board.

However, while your points stated in the WWA board letter to the delegation and Park supers were thoughtful, you have unfortunately perpetuated errors I feel compelled to clarify.

1. The 1988 study you referred to in your letter, in which the paddling ban was upheld, was indeed NOT a NEPA analysis or document, as stated in your letter. It was the product of a roundtable of Park employees imagining what impacts might occur if they allowed paddling, but they saddled impacts that can apply to any backcountry user solely on paddlers. This is why the Parks did not cite the study in the 2012 Snake River Headwaters CRMP. Even the Parks knew it was an inadequate document. This is why the Yellowstone and Grand Teton Paddling Act is so important for final resolution on this issue.

Paddling is an accepted low-impact activity in every other National Park and Wilderness Area. Yellowstone and Grand Teton have world-class recreational river resources. Diligent stewardship of these resources should include a NEPA analysis of appropriate recreational opportunities. This requirement was funded and required in the CRMP for the Snake River Headwaters, but was wrongfully dismissed. HR 974 rights that wrong.

2. I agree that it would not be a desired outcome if the passage of HR 974 gave other groups the green light to legislate access. However, I do not believe this is real concern. Firstly, HR 974 does not legislate access. It responds to an NPS oversight by legislating analysis and management, which is very different than the insinuation in your letter. Secondly, HR 974 is not a precedent-setting measure because there is a legal historic basis and need for resolution. Other recreational uses do not have this basis. The precedent that is much more concerning to me is the Parks getting away with banning a traditional primitive use for 60 years with no real analysis or review.

3. While it is true that the Parks have many issues to address, a complete NEPA analysis of recreation in Park river corridors is greatly needed. Last year, YNP increased commercial horse use in the river corridors and motorboat use on the lakes without any analysis. On a Park wide level, a home was made for snowmobiles, while snow bikes remained banned. Traffic continues to increase each year unabated with no acknowledgement of the need for a transportation plan. GTNP allows 60,000 motor boat and commercial raft rides each summer. Meanwhile, an arbitrary ban on backcountry paddling has been perpetuated. Let's face it, visitor use management in these Parks is haphazard at best! It has been over 30 years since YNP last discussed paddling, and there NEVER has been a diligent NEPA analysis of recreation in YNP's river corridors. It really is time that this happened. A diligent analysis would balance traditional uses of Park river corridors; and give the Parks much-needed baseline data on aquatic invasive species, social trails, and impacts of the many other uses already occurring in the river corridors. We believe that paddling can be balanced with these other uses. Indeed, the systems are already in place to allow paddling in sustainable amounts...in the form of designated campsites and backcountry permits, etc.

To me, the issue is less about paddling than it is simply about ensuring that Americans have the freedom to roam the wilderness by the appropriate means of their choosing. There are those in the orthodox conservation

community that would completely close the Yellowstone backcountry to all human visitation. It is obvious how much time those people spend back there, because if they spent any time there, they would know that the bears and ducks are doing just fine, and that traditional primitive backcountry users of all kinds are minuscule in the big picture of wilderness, especially if there is thoughtful management. These “conservationists” just see the Park front country, and the busy roadside rivers around the ecosystem. No wonder.

I know I speak for many very-smart conservation-minded recreationists who believe paddling is a low-impact appropriate use that can be managed sustainably in YNP/GTNP. Yet these Parks still have not shown why this is not true. I am disappointed that WWA did not break ranks with other conservation groups and take a stand for a traditional primitive form of wilderness recreation. Can we afford not to? All other recent political discourse points to the need to jump on every opportunity to connect people sustainably to wild places. HR 974 is as good as any opportunity. Sustainably-managed primitive recreation on public lands is not a popularity contest. It is a basic human right. I am dreaming of balanced management in these Parks, and it has to start somewhere. Change will not come easily or on its own. It will take brave souls and bold moves to change the status quo in these Parks. HR. 974 is a good first step, and I commend Rep. Lummis for introducing it. I appreciate your interest in further discussion on this issue, and look forward to working with WWA for the best possible outcome should HR 974 become law.

Thomas Turiano

Vice-President

American Packrafting Association



Main Office: P.O. Box 6588, Sheridan, WY 82801  
307 672-2751 office 307 672-2752 fax [info@wildwyo.org](mailto:info@wildwyo.org)  
Website: [www.wildwyo.org](http://www.wildwyo.org)

October 20, 2015

Congressman Cynthia Lummis  
2433 Rayburn House Office Building  
Washington, D.C. 20515

**RE: H.R. 974**

Dear Representative Lummis:

The Wyoming Wilderness Association (WWA) opposes H.R. 974. WWA's mission is to work to protect Wyoming's public wild lands.

More specifically, Yellowstone and Grand Teton National Parks are widely popular flagships of the United States Park System. This year, Yellowstone received over 3.8 million visitors. Despite this, much of the park is managed as wilderness. NEPA analysis conducted in 1988 concluded: "Due to the high level of potential impact that river boating has on the biophysical environment of Yellowstone National Park, the No Boating/ No Action Alternative is recommended."

WWA shares the concerns of the Greater Yellowstone Coalition, (sent to you previously), that H.R. 974 is a precedent-setting measure. Its passage will encourage user groups desiring an increase in access for other purposes not compatible with Yellowstone wildlands.

Paddling and some other forms of river recreation are generally acceptable forms of use in wilderness. However, Yellowstone and Grand Teton National Parks already have a host of other use issues that must be addressed and we think the 1988 conclusion regarding boating is still applicable.

On behalf of the Governing Council of WWA, thank you for considering our position on H.R. 974.

Sincerely,

Carolyn Schroth  
Executive Director  
Wyoming Wilderness Association

cc: Senator Mike Enzi  
Senator John Barrasso  
Caroline Byrd, E.D., Greater Yellowstone Coalition  
Dan Wenk, Superintendent, Yellowstone National Park  
David Vela, Superintendent, Grand Teton National Park