



APPENDIX A

CSP Standard Project Requirements

**California Department of Parks and Recreation
Resource Services
STANDARD PROJECT REQUIREMENTS**

General

- Prior to the start of on-site construction work, a [insert who] will consult with the contractor and project manager to identify all resources that must be protected.
- No track-mounted or heavy-wheeled vehicles will be allowed in identified environmentally sensitive areas at any time; foot traffic will only be allowed with specific permission from the State's Representative after clearance from [insert who].
 - At the discretion of [insert who], mechanized vehicles on [insert discipline] resource sites will be restricted to a short term use of rubber tire tractors only. All such vehicles must enter and exit the area via the same route of travel (by backing up). Vehicles are strictly prohibited from turning on the surface of site(s).
- Prior to the start of on-site construction work, a DPR-qualified [insert discipline] Resources Specialist will train construction personnel in [insert discipline] Resource identification and protection procedures.
- Prior to the start of on-site construction work, and at the discretion of a [insert who], a [insert who] will flag and/or fence all [insert discipline or resource] with a buffer of [insert distance] for avoidance during on-site construction activities. The [insert who] will remove the fencing after project completion.
- Prior to any earthmoving activities, a DPR-qualified [insert who] will approve all subsurface work, including the operation of heavy equipment within [insert distance] of the identified Environmentally Sensitive Area (ESA).
- Prior to the start of [insert type] work, [Insert who] will notify the [insert Office name and who] or [insert alternative Office name and who] a minimum of three weeks in advance, unless other arrangements are made, to schedule [insert discipline or resource] monitoring.
- A DPR qualified [insert who] will monitor all ground disturbing phases of this project at his/her discretion.

Cultural Resources

General Cultural Standard Requirements

- If forest thinning activities are required within a culturally sensitive area, downed timber and other forest debris will be removed by aerial suspension; no portion of logs, slash or debris will be dragged across the surface.
- Prior to the start of on-site construction work, the [insert who] will notify the **Cultural Resources Supervisor**, unless other arrangements are made in advance, a minimum of three weeks to schedule a **Cultural Resource Specialist** to monitor work, as necessary, to ensure that removal and reconstruction of historic fabric will occur in a manner consistent with the Secretary of the Interior's Standards.
- Before, during, and after construction, a [Insert who] will photo-document all aspects of the project and will add the photos to the historical records (archives) for the park.
- Prior to the start of on-site construction work, and to the extent not already completed, a [insert who] will map and record all cultural features within the proposed Area of Potential Effects (APE) to a level appropriate to the Secretary of Interior Standards.

Historian's Standard Requirements

- All historic work will comply with the Secretary of the Interior Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings.
 - Historic character will be retained and preserved;
 - where safe, original materials that still maintain structural integrity will be retained; and
 - where replacement is required, materials and features will be replaced “in kind”.
 - A **[insert who]** familiar with the project site’s cultural/historic resources will monitor all construction activities. All historical resources uncovered during the project will be recorded in place with a photograph and/or drawing showing any new material or recovered and archived, at the discretion of the monitor.
 - Upon completion of the project, **[Insert who]** will record any modifications to historic buildings or alterations of historic fabric on as-built drawings.

Archaeologist's Standard Requirements

- Prior to the start of any ground-disturbing activities, a DPR-approved archaeologist will complete pre-construction testing to determine specific avoidance areas.
 - If necessary, a DPR-qualified Cultural Resource Specialist will prepare a research design, including appropriate trenching and/or pre-construction excavations
 - Based on preconstruction testing, project design and/or implementation will be altered, as necessary, to avoid impacts to archaeological resources or reduce the impacts to a less than significant level, as determined in consultation with a DPR-qualified archaeologist.
- **[Insert who]** will manually remove or flush cut vegetation to avoid ground-disturbing activities; removal of roots will not be allowed. In areas lacking appropriate archaeological survey coverage only chemical treatments will be allowed unless archaeological surveys are performed first.
- If **anyone** discovers previously undocumented cultural resources during project construction, work within **[insert distance]** of the find will be temporarily halted until the archaeologist designs and implements appropriate treatments in accordance with the Secretary of the Interiors Standards and Guidelines for archaeological resource protection.
 - **[Insert who]** will modify the project to ensure that construction activities will avoid cultural resources upon review and approval of a **[insert who]**.
 - If ground disturbing activities uncover intact cultural features (including but not limited to dark soil containing shellfish, bone, flaked stone, groundstone, or deposits of historic ash), when a DPR Qualified cultural resources specialist is not on-site, **[insert who]** will contact the DPR State Representative immediately and **[insert who]** will temporarily halt or divert work within the immediate vicinity of the find a DPR-qualified cultural resources specialist evaluates the find and determines the appropriate treatment and disposition of the cultural resource.
- In the event that human remains are discovered, work will cease immediately in the area of the find and the project manager/site supervisor will notify the appropriate DPR personnel. Any human remains and/or funerary objects will be left in place or returned to the point of discovery and covered with soil. The DPR Sector Superintendent (or authorized representative) will notify the County Coroner, in accordance with §7050.5 of the California Health and Safety Code, and the Native American Heritage Commission (or Tribal Representative). If a Native American

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monitor is on-site at the time of the discovery, the monitor will be responsible for notifying the appropriate Native American authorities. The local County Coroner will make the determination of whether the human bone is of Native American origin.

- If the Coroner determines the remains represent Native American interment, the NAHC in Sacramento and/or tribe will be consulted to identify the most likely descendants and appropriate disposition of the remains. Work will not resume in the area of the find until proper disposition is complete (PRC §5097.98). No human remains or funerary objects will be cleaned, photographed, analyzed, or removed from the site prior to determination.
- If it is determined the find indicates a sacred or religious site, the site will be avoided to the maximum extent practicable. Formal consultation with the State Historic Preservation Office and review by the Native American Heritage Commission/Tribal Cultural representatives will occur as necessary to define additional site mitigation or future restrictions.

Natural Resources

General Biological Resource Standard Project Requirements

- All project activities that could spread **[insert organism]** to new locations will be subject to Best Management Practices developed by **[insert group name]** and available online at **[insert location – i.e. web address]**.
- Prior to the start of on-site construction activities, **[insert who]** will conduct a survey of the project area for **[insert what]**.
- Prior to the start of on-site construction activities, **[insert who]** will determine the minimum area required to complete the work and define the boundaries of the work area on the project drawings and with flagging or fencing on the ground, as appropriate.
- To prevent the spread of noxious weeds, all construction vehicles and equipment will enter and leave the project site free of soil, vegetative matter or other debris that could contain weed seeds.
- All construction will be consistent with the State Parks Trail Manual guidelines.
- At the discretion of **[insert who]**, project activities will be monitored to ensure that impacts to **[insert species name(s)]** are minimized.
- **[Insert who]** will submit a summary report of all collecting activities conducted at **[Insert park name]** to the **[insert District name]** Environmental Scientist upon completion of the project.
- The **[insert who]** will post information signs near project areas with restricted access or closures lasting longer than 3 months. The signs will include the following information:
 - Explanation for and description of the project; and
 - Anticipated completion date.

Plants

- No rare or endangered species will be cut, pruned, pulled back, removed or damaged in any way.
- If **[insert plant species or community]** are located within **[insert number]** feet of the project area, the **[insert what]** will be flagged by **[insert who]**, fenced off prior to the start of on-site construction activities, and completely avoided.
- Best Management Practices (BMPs) to avoid creation of dust will be employed during all construction activities within **[insert distance]** of **[insert species or plant community]**.

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- If **[insert what]** of **[insert species or plant community name]** are discovered within **[insert distance]** of the project area, a **[insert who]** will flag and fence these locations during construction activities to avoid impacts.
- Prior to the start of on-site construction activities and when the plants are in a phenological stage conducive to positive identification (i.e., usually during the blooming period for the species), a **[insert who]** will conduct surveys for special-status plant species throughout the project area.
- Prior to the start of on-site construction activities, a **[insert who]** will flag and fence plant communities (e.g., vegetation series, alliances, or associations) within **[insert number]** feet of the project area to avoid impacts.
- No **[insert what – staging, ground-disturbing, etc.]** will be allowed within **[insert number]** times the diameter-at-breast-height (dbh) of retention trees, unless approved in advance by a DPR-approved biologist, forester, or certified arborist.
- The **[insert who]** will avoid or minimize impacts to federally protected wetlands to the extent practicable by conducting work in upland areas.
- A **[insert who]** will be present during all ground-disturbing activities within the **[insert quantitative area]** of trees.
- Project area will be monitored and maintained by **[insert who]** for up to **[insert time period]**. Including regular watering and replacement planting, as necessary to assure an approximately **[insert percentage]** survival rate.
- Any trenching in a “structural root zone” will be completed by hand; no roots larger than **[insert diameter size]** in diameter will be cut or damaged.
- All herbicides will be handled, applied, and disposed of in accordance with the MSDS Fact Sheet and all local, State, and federal laws.
- To maintain genetic integrity, only plant stock collected within the **[insert area name]** will be used for re-vegetation in the project area.
- **[Insert who]** will employ Best Management Practices (BMPs) for erosion control to avoid runoff of project-related sediments, vehicle fluids, and other liquids into special plant communities.
- The percolation testing will be conducted at a minimum distance of **[insert quantitative distance]** of any significant tree over **[insert number]** DBH.

Wildlife

- **[Insert Name]** will schedule all work between **[insert dates]** to avoid the **[insert species name]** **[insert what – breeding, maternity, nesting, flight period, etc.]**.
- If work is required during the **[insert what]** season (**[insert dates]**), a **[insert who]** will conduct a survey to identify **[insert what - nest, colony, etc]** within **[insert distance]** of the project area. The survey will be conducted no more than **[insert number]** calendar days prior to the beginning of construction.
- If **[insert what]** are located within **[insert distance]** feet of the project area, no construction will occur within **[insert distance]** of the **[insert what]** during the **[insert what]** season or until the young have fledged, as determined by a DPR-approved biologist.
- If work must occur during the breeding season, the USFWS’s *“Transmittal of Guidance: Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northwestern California”* (dated July 31, 2006) may be used by a DPR-approved biologist to allow limited construction activities that do not create noise disturbance above ambient levels.

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- If limited activities are allowed during the **[insert species name] [insert what breeding, nesting, etc.]** season, work activities will not begin until **[insert number]** hours after sunrise and will cease **[insert number]** hours before sunset each day.
- Prior to the start of on-site construction activities, a **[insert who]** will train on-site construction personnel on the life history of **[insert species name]**, work constraints, and any other pertinent information related to the species.
- Within **[insert number]** hours prior to the start of construction activities, a **[insert who]** will conduct surveys for **[insert what]** in the project area and up to **[insert number]** feet outside the project boundaries.
- If individuals or other recent signs of **[insert species name]** are observed within **[insert distance]** of the project area, **[insert who]** will be present on the site to monitor during construction activities at his/her discretion.
- Immediately prior to the start of work each morning, **[insert who]** will conduct a visual inspection of the construction zone.
- If **[insert species name]** is found on the project site, work in the vicinity of the animal will be delayed until the species moves out of the site on its own accord, or is temporarily relocated by **[insert agency name - approved or -permitted]** biologist.
- To prevent trapping of **[insert species name]**, all holes and trenches will be covered at the close of each working day with plywood or similar materials, or will include escape ramps constructed of earth fill or wooden planks; all pipes will be capped. A **[insert who]**, or other staff trained by a **[insert who]** will inspect trenches and pipes for **[insert species name]** at the beginning of each workday. If a trapped animal is discovered, they will be released in suitable habitat at least **[insert quantitative distance]** from the project area.
- All field staff will wear protective clothing and equipment while working with **[insert species name]** live animals and handling carcasses.
- Baiting will not occur between **[insert months]** when **[Insert sensitive species name]** are present.
- **[Insert who]** will not remove any trees equal to or greater than **[insert number]**-inches dbh unless first inspected by **[insert who]** and determined to be unsuitable as nesting habitat for **[insert species name]**.

Aesthetics

- Projects will be designed to incorporate appropriate park scenic & aesthetic values including the choices for: specific building sites, scope & scale; building and fencing materials and colors; use of compatible aesthetic treatments on pathways, retaining walls or other ancillary structures; location of and materials used in parking areas, campsites and picnic areas; development of appropriate landscaping. The park scenic and aesthetic values will also consider views into the park from neighboring properties.
- **[Insert who]** will store all project-related materials outside of the viewshed of **[insert name of street/place/building]**.
- **[Insert who]** will equip any permanent structure with outdoor light shields that concentrate the illumination downward to reduce direct and reflected light pollution. The direct source of the lighting (bulb, lens, filament, tube, etc) will not be visible off site and the lighting will be installed as low as possible on poles and/or structures to minimize light pollution of the night sky. The candle power of the illumination at ground level will not exceed what is required by any safety or security regulations of any government agency with regulatory oversight.

Air Quality

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- During dry, dusty conditions, all active construction areas will be lightly sprayed with dust suppressant to reduce dust without causing runoff.
- All trucks or light equipment hauling soil, sand, or other loose materials on public roads will be covered or required to maintain at least two feet of freeboard.
- All gasoline-powered equipment will be maintained according to manufacturer's specifications, and in compliance with all State and federal requirements.
- Paved streets adjacent to the Park shall either be swept or washed at the end of each day, or as required, to remove excessive accumulations of silt and/or mud that could have resulted from project-related activities.
- Excavation and grading activities will be suspended when sustained winds exceed 15 miles per hour (mph), instantaneous gusts exceed 25 mph, or when dust occurs from remediation related activities where visible emissions (dust) cannot be controlled by watering or conventional dust abatement controls.

Geology and Soils (erosion)

- After a large earthquake event (i.e., magnitude 5.0 or greater within 50 miles of the project site), **[insert who]** will inspect all project structures and features for damage, as soon as is possible after the event. Any damaged structures or features will be closed to park visitors, volunteers, residents, contractors, and staff.
- No track-mounted or heavy-wheeled vehicles will be driven through **[insert work area name]** areas during the rainy season or when soils are saturated to avoid compaction and/or damage to soil structure.
- **[Insert who]** will develop a rehabilitation plan for the decommissioned trail that includes using brush and trees removed from the new trail alignment for bio-mechanical erosion control (bundling slash and keying it in to fall of trail, filling damaged trails sections with soil and duff removed from the new trail alignment, constructing water bars, and replanting native trees and shrubs).
- **[Insert who]** will clearly block both ends of the trail and scatter its length with vegetative debris from new trail construction to discourage continued use and degradation of the decommissioned portion of the trail.

Hazards

- Prior to the start of on-site construction activities, **[insert who]** will inspect all equipment for leaks and regularly inspect thereafter until equipment is removed from the project site. All contaminated water, sludge, spill residue, or other hazardous compounds will be contained and disposed of outside the boundaries of the site, at a lawfully permitted or authorized destination.
- Prior to the start of on-site construction activities, **[insert who]** will prepare a Spill Prevention and Response Plan (SPRP) as part of the Storm Water Pollution Prevention Plan (SWPPP) for **[insert who]** approval to provide protection to on-site workers, the public, and the environment from accidental leaks or spills of vehicle fluids or other potential contaminants. This plan will include (but not be limited to);
 - a map that delineates construction staging areas, where refueling, lubrication, and maintenance of equipment will occur;
 - a list of items required in a spill kit on-site that will be maintained throughout the life of the project;
 - procedures for the proper storage, use, and disposal of any solvents or other chemicals used in the restoration process;

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- and identification of lawfully permitted or authorized disposal destinations outside of the project site.
- **[Insert who]** will develop a Materials Management Plan to include protocols and procedures that will protect human health and the environment during remediation and/or maintenance activities that cause disturbances to the native soil and/or mine and mill materials causing the potential exposure to metals and dust resulting from materials disturbances. All work will be performed in accordance with a Site Health and Safety Plan. The Materials Management Plan will include the following (where applicable):
 - Requirement that staff will have appropriate training in compliance with 29 CFR, Section 1910.120;
 - Methods to assess risks prior to starting onsite work;
 - Procedures for the management and disposal of waste soils generated during construction activities or other activities that might disturb contaminated soil;
 - Monitoring requirements;
 - Storm water controls;
 - Record-keeping; and,
 - Emergency response plan.
- **[Insert who]** will set up decontamination areas for vehicles and equipment at Park entry/exit points. The decontamination areas will be designed to completely contain all wash water generated from washing vehicles and equipment. Best Management Practices (BMPs) will be installed, as necessary, to prevent the dispersal of wash water beyond the boundaries of the decontamination area, including over-spray.
- Prior to the start of construction, **[insert who]** will develop a Fire Safety Plan for **[insert name]** approval. The plan will include the emergency calling procedures for both the California Department of Forestry and Fire Protection (CDF) and local fire department(s).
- All heavy equipment will be required to include spark arrestors or turbo chargers (which eliminate sparks in exhaust) and have fire extinguishers on-site.
- Construction crews will park vehicles **[insert distance]** from flammable material, such as dry grass or brush. At the end of each workday, construction crews will park heavy equipment over a non-combustible surface to reduce the chance of fire.
- DPR personnel will have a State Park radio at the Park, which allows direct contact with CalFire and a centralized dispatch center, to facilitate the rapid dispatch of control crews and equipment in case of a fire.
- Prior to the start of on-site construction activities, **[insert who]** will clean and repair (other than emergency repairs) all equipment outside the project site boundaries.
- Under dry conditions, a filled water truck and/or fire engine crew will be onsite during activities with the potential to start a fire.
- **[Insert who]** will designate and/or locate staging and stockpile areas within the existing maintenance yard area or existing roads and campsites to prevent leakage of oil, hydraulic fluids, etc. into **[insert where i.e., native vegetation, sensitive wildlife areas, creek, river, stream , etc.]**.

Hydrology

- Prior to the start of construction involving ground-disturbing activities, **[insert who]** will prepare and submit a Storm Water Pollution Prevention Plan (SWPPP) for DPR approval that identifies temporary Best Management Practices (BMPs) (e.g., tarping of any stockpiled materials or soil; use of silt fences, straw bale barriers, fiber rolls, etc.) and permanent (e.g., structural containment, preserving or planting of vegetation) for use in all construction areas to reduce or eliminate the discharge of soil, surface water runoff, and pollutants during all excavation,

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grading, trenching, repaving, or other ground-disturbing activities. The SWPPP will include BMPs for hazardous waste and contaminated soils management and a Spill Prevention and Control Plan (SPCP), as appropriate.

- All heavy equipment parking, refueling, and service will be conducted within designated areas outside of the 100-year floodplain to avoid water course contamination.
- The project will comply with all applicable water quality standards as specified in the **[insert WQCB name]** Basin Plan.
- All construction activities will be suspended during heavy precipitation events (i.e., at least 1/2-inch of precipitation in a 24-hour period) or when heavy precipitation events are forecast.
- If construction activities extend into the rainy season (**[insert dates]**) or if an un-seasonal storm is anticipated, **[insert who]** will properly winterize the site by covering (tarping) any stockpiled materials or soils and by constructing silt fences, straw bale barriers, fiber rolls, or other structures around stockpiles and graded areas.
- **[Insert who]** will install appropriate energy dissipators at water discharge points, as appropriate.

Traffic

- Prior to the start of on-site construction activities that would result in **[insert number]** or more vehicle trips during peak hours (7:00 a.m. to 9:00 a.m. or 4:00 p.m. to 6:00 p.m.) for a period exceeding 6 months in duration, **[insert who]** will prepare a Traffic Impact Study (TIS) for submittal and approval by **[insert who]**. The TIS will include, but will not be limited to:
 - Description of traffic inducing actions;
 - Types of vehicles anticipated;
 - Approximate traffic volumes on/ offsite and roadways to be used;
 - Existing Traffic Counts;
 - Analysis of Project Action traffic volume impacts on intersections and traffic index; and
 - Any other TIS requirements as outlined in the appropriate jurisdiction's guidance on TIS preparation
- Prior to delivery and/or removal of project-related equipment or materials that could impede or block access to driveways, cross streets, or street parking, **[insert name]** will coordinate with the local jurisdictions to develop and implement traffic control measures.

Noise

- Temporary or permanent noise barriers such as berms or walls will be used, as appropriate, to reduce noise levels.
- Internal combustion engines used for project implementation will be equipped with a muffler of a type recommended by the manufacturer. Equipment and trucks used for Project-related activities will utilize the best available noise control techniques (e.g., engine enclosures, acoustically attenuating shields or shrouds, intake silencers, ducts, etc.) whenever necessary.
- **[Insert who]** will locate stationary noise sources and staging areas as far from potential sensitive noise receptors, as possible. If they must be located near potential sensitive noise receptors, stationary noise sources will be muffled or shielded, and/or enclosed within temporary sheds.
- Construction activities will generally be limited to the daylight hours, Monday – Friday. If work during weekends or holidays is required, no work will occur on those days before **[insert time]** a.m. or after **[insert time]** p.m. **(check contract docs for time restrictions)**
- Internal combustion engines used for any purpose at the job site will be equipped with a muffler of a type recommended by the manufacturer. Equipment and trucks used for

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construction will utilize the best available noise control techniques (e.g. engine enclosures, acoustically-attenuating shields, or shrouds, intake silencers, ducts, etc.) whenever necessary.



APPENDIX B

Scenic Resources Typical Views for Existing Conditions



This Appendix contains photographs referenced in Section 2.4, Scenic Resources, of Chapter 2, Existing Conditions. These photographs provide representative views of scenic resources within ASRA.



Source: Photograph by California State Parks in 2018

Figure SC-1 View of the Confluence area with State Route 49 in the background in the Confluence Management Zone.



Source: Photograph by Ascent Environmental in 2018

Figure SC-2 View of the Auburn Dam Site at China Bar in the Auburn Interface Management Zone.



Source: Photograph by California State Parks in 2018

Figure SC-3 View of Foresthill Divide in the Foresthill Divide Management Zone.



Source: Photograph by Ascent Environmental in 2018

Figure SC-4 View of the entrance to Mammoth Bar OHV recreation area in the Mammoth Bar Management Zone.



Source: Photograph by California State Parks in 2018

Figure SC-5 Typical view of the Knickerbocker Flat area in the Knickerbocker Management Zone.



Source: Photograph by California State Parks in 2018

Figure SC-6 View of the Foresthill Bridge from the Confluence in the Confluence Management Zone.



Source: Photograph by Ascent Environmental in 2018

Figure SC-9 View of the restroom and parking facilities on Old Foresthill Road in the Confluence Management Zone.



Source: Photograph by Ascent Environmental in 2018

Figure SC-10 View of the North Fork of the American River canyon from an overlook into the park in the Auburn Interface Management Zone.



APPENDIX C

Whitewater Management



Auburn State Recreation Area
Whitewater Management
FACT SHEET
May 2019

This document describes the development and evolution of the current system for managing whitewater (WW) recreation use within Auburn State Recreation Area, and specifically commercial WW recreation use. The current system is based on several past WW management plans and studies, which are summarized below. The specific manner in which the current system is based on these past plans and studies is specifically highlighted and discussed, as are differences between the current system and past plans.

The California Department of Parks and Recreation (CSP) began managing recreation and public use of the Auburn Dam Project Lands in 1977 through a series of agreements with the U.S. Bureau of Reclamation (Reclamation). The area was named and classified as Auburn State Recreation Area in 1979.

I. Auburn Reservoir Project and Folsom Lake State Recreation Area General Plan, October 1978, California Department of Parks and Recreation.

CSP prepared a General Plan for both Folsom Lake State Recreation Area and the Auburn Reservoir Project in 1978 (approved in 1979). The assumption for the Auburn portion of the Plan was that the Auburn Dam would be constructed and the area would be a reservoir based recreation opportunity. Given that the Dam was not constructed, the General Plan was never useful for managing the recreation use and resources of the two river canyons.

II. Early Whitewater Management

Whitewater recreation on the North Fork (NF) and Middle Fork (MF) of the American River within ASRA was relatively light through the 1970's. However, beginning in 1980, both commercial and non-commercial use of the NF and MF began to grow in popularity. Starting in 1982, CSP implemented a commercial WW use permit system on stretches of the NF and MF. In 1982, six commercial use permits were issued, by 1985 fifty-seven commercial permits were issued.

Based on the rapid growth of WW recreation use, and problems and conflicts occurring, CSP implemented additional management actions and requirements in 1985 for commercial outfitters:

North Fork

- Established a permit period for commercial operators from May 4 – July 7.
- Assigned start times to commercial outfitters, 2 trip starts every 30 minutes from 9am through 1pm on weekends and holidays.
- Established limit of 18 trips per day.

- Limited trip size to 4 rafts.
- Separated commercial put-in and non-commercial put-in.

Middle Fork

- Established permit period from May 4 – September 15.
- Assigned start times to outfitters, 2 trip starts every 30 minutes from 9am to 1pm on weekends and holidays.
- Established a limit of 14 trips per day.
- Limited trip size to 5 rafts.
- Various other requirements related to overnight camping, portage and take-outs.

All of the above was summarized from the Proposed Whitewater Recreation Management Plan (Watson, 1986), which is described below.

III. Proposed Whitewater Recreation Management Plan for the North Fork and Middle Fork of the American River, California, March, 1986, Chuck Watson Environmental Consulting.

The “Proposed Whitewater Recreation Management Plan for the North Fork and Middle Fork of the American River, California,” March, 1986 was prepared by environmental consultant Chuck Watson for Reclamation and CSP. It documented the rapid increase in whitewater recreation use on the NF and MF between 1980 and 1985. This rapid increase in use by both commercial and non-commercial whitewater users resulted in an increasing number of conflicts reported between commercial and non-commercial users at put-ins and rapids and conflicts between WW recreation users and other recreation users and private landowners along the river. The study also indicates there were concerns regarding the recreational carrying capacity of these rivers. For these reasons, WW management planning efforts were initiated by CSP and Reclamation in 1984. The Proposed Plan conducted surveys over the 1985 boating season to identify characteristics of the WW recreation resource, use level estimates and behavior patterns and to inform the management recommendations for the NF (from Iowa Hill Bridge to Upper Lake Clementine) and MF (from Oxbow to the Confluence).

Characteristics and Use

North Fork

The Proposed Plan identified and examined three segments on the NF: Iowa Hill to Shirttail Canyon (4.7 mi), Shirttail to Ponderosa Crossing (4.5 mi) and Ponderosa to Upper Lake Clementine (4.1 mi). It characterized the 4.7 mile stretch of the NF from Iowa Hill Bridge to Yankee Jims Bridge (commonly referred to as the Chamberlin Falls Run) as a steep gradient narrow bedrock/boulder gorge Class IV run. While WW boating equipment and skill has evolved and increased over the decades, this remains an accurate characterization and rating of this run. The 4.5 mile run from Yankee Jims (Shirttail Creek) to Ponderosa Crossing is primarily a Class II run with a couple of

boulder/bedrock Class III rapids and the 4.1 mile segment from Ponderosa Crossing to Upper Lake Clementine is a Class II run composed of gravel bar riffles.

The Proposed Plan noted the NF is a free flowing river and the WW season was generally from April to mid-June. Based on surveys, the Proposed Plan estimated use on the NF in 1985 at 4141 users with 55% of the use commercial and 45% of the use non-commercial. CSP issued 57 commercial outfitter permits in 1985.

Middle Fork

The Plan examined 24 miles of the MF from Oxbow to the Confluence, identifying three segments: from Oxbow to Canyon Creek (13 mi); Canyon Creek to Oregon Bar (2.1 mi, Class III-IV and Ruck-a-Chucky was considered un-runnable at the time); and Oregon Bar to the Confluence (8.9 mi, Class II with Class V Murderers Bar). Note: this Oregon Bar is in the Greenwood/Ruck-a-Chucky area, there is another Oregon Bar downstream.

The Proposed Plan estimated 8063 users on the MF in the 1985 boating season and noted that 97% of use was on the stretch from Oxbow to Canyon Creek or Oregon Bar (just downstream of Greenwood Bridge site). It indicated 90% of the use on the MF was commercial WW use.

Use and Management Problems

North Fork

Observations, counts and surveys in the 1984 and 1985 boating seasons documented traffic and parking issues at river access points, congestion at put-ins and take-outs, congestion at a rapids/river constrictions, and conflicts between commercial and non-commercial users. Another issue noted was the narrow technical channel, which resulted in congestion, bottlenecks and delays at rapids at lower levels of use than other regional rivers. Observations documented the very limited amount of space and parking at the commercial put-in area, which limited how many commercial outfitters can use the put-in at any one time.¹ The Proposed Plan noted that in the middle of the 1985 season, CSP separated the put-in for commercial and non-commercial use at Mineral Bar to different sides of the river, which helped reduce conflicts.

Middle Fork

Observations documented concentrated use and congestion on weekends at river access points and along the river down to Tunnel Chute. Much of the congestion and conflict can be attributed to the release patterns at Oxbow Powerhouse.²

Based on the 1984 and 1985 observations, the Plan concluded there were serious conflicts between commercial and non-commercial use on both the NF and MF. In the

¹ This physical constraint remains true today.

² This remains a constraint on the Middle Fork to the present time. Though modest adjustments have been made in the recreational flow release schedule through FERC re-licensing, in most water year types there is a commitment for only a 3-4 hour window of boatable flows in the morning on summer weekends.

1985 season, CSP implemented requirements of commercial permittees to address some of these congestion problems. These requirements included designated start times and trip size limits, the designated commercial put-in on the NF and parking limitations at take-outs.

Management Objectives

The Proposed Plan developed management objectives for the NF and MF based on the characteristics of the WW resource including physical characteristics (channel, technical difficulty), season of use, trip length, proximity to population centers and comparison of these parameters to other rivers in the region including the South Fork American and Tuolumne. The Proposed Plan noted that due to the narrow constricted channel and technical aspects of the run (presumably Chamberlin Falls segment), the NF has a primitive character despite its proximity to population centers. The Proposed Plan highlighted the importance of the MF as a WW recreation resource due to reliable summer boating flows and the relatively isolated nature of the upper portion of the MF.

Carrying Capacity³

The Proposed Plan described carrying capacity concepts and methodologies on how these apply to river recreation. The Proposed Plan used a simple approach to addressing carrying capacity, considering physical, facility and social factors, the Plan utilizes a “user contact” concept to address carrying capacity. The Proposed Plan provided descriptions of low, moderate and high contact levels.

“Moderate Contact” is defined as:

“This is a level of contact that imparts a sense of user/group contact as an obvious element of the experience and may require some accommodation of itinerary or use pattern, but is not great enough to make contact a major element of the experience. A moderate contact, “primitive experience” is possible and user perceptions range from a sense of user/group contact to a sense that “crowding may be an identifiable element of the experience.”

The Moderate Contact level is differentiated from a Low Contact level by providing an opportunity for a “primitive” experience versus a “wilderness” experience.

Findings and Recommendations

³ The concept of carrying capacity in recreational settings has been around a long time and different approaches and methodologies have evolved over time (ROS, LAC, VERP, etc). While approaches and methodologies have changed, carrying capacity has not been abandoned as a concept and tool by recreation managers, researchers or all land management agencies. It is our understanding that Reclamation no longer utilizes WALROS, however CSP is required by law (CA Public Resources Code 5001.96 and 5019.5) to address carrying capacity of our park units in our General Plans. Carrying capacity is a concept and strategy to establish and achieve the management objectives and prescriptions for different areas within a park unit or public lands. The Management Zones and Land Use Designations proposed for the current ASRA GP/RMP project are another example of a framework and tool to establish broad management goals and objectives.

The Proposed Plan recommended managing both the NF and MF at Moderate Contact use levels; and to focus management on non-commercial values for the NF and commercial use values for the MF (due to logistical challenges for non-commercial users). The Proposed Plan recommended establishing daily commercial use limits to achieve this management objective.

Based on observations at the put-ins, bottleneck points along the river and take-outs, the Proposed Plan developed instantaneous (# of groups at one time) and daily capacity limits (# of groups per day) for commercial operators in order to achieve the “Moderate Contact” objective. Here is a summary of these numbers:

North Fork Weekends

- Iowa Hill put-in – 4 groups at one time, 19 groups per day.
- Chamberlin Falls - 3-4 groups at one time, 5-6 groups per day
- Ponderosa take-out – 4 groups at one time, 8 groups per day.

Middle Fork

- Oxbow put-in – 6 groups at one time, 7 groups per day.
- Tunnel Chute – 5 groups at one time, 22 groups per day.
- Ruck-a-Chucky take-out⁴ – 6 groups at one time, 17 groups per day.
- Ruck-a-Chucky portage – 3 groups at one time, 5 groups per day.
- Oregon Bar (Greenwood) take-out – 2 groups at one time, 24 groups per day.

Considering all of the information developed and looking at the most limiting areas and factors, the Proposed Plan recommended the following overall daily limits for commercial use. Note: it is our understanding of the Plan that for making observations and developing carrying capacity limits the term “groups” is used to describe a distinct set of rafts traveling down the river together as a unit. For the purposes of defining limits in commercial outfitter permits or contracts, the Plan uses the terms “trips” or “trip starts.”

North Fork

- A limitation of 6 commercial trip starts on weekend days and 12 trip starts on mid-week days.
- A limit of 4 rafts per commercial trip.

⁴ This take-out no longer used on a regular basis due to the condition of the road from Ruck-a-Chucky to the take-out location at Canyon Creek.

Middle Fork

- A limit of 10 daily commercial trip starts per day and 5 Ruck-a-chucky portages per day.
- A limit of 5 rafts per trip for 1-day trips and 6 rafts per trip for overnight trips.

Other recommendations (both Forks):

- Require outfitters to meet clients off-site
- Permit requirement limited to commercial operators.
- Pre-season allocation system that assigns daily trip starts to commercial outfitters so daily use limits can be assured.
- Adjustments to commercial daily use limits based on changes in trends in non-commercial use or changes in use patterns.
- Requirements for specific areas and mode of operations at put-ins and take-outs.
- Require fire pans, portable toilets, solid waste removal, and proper food management.

IV. Draft White Water Management Plan North Fork and Middle Fork, American River, 1987, California Department of Parks and Recreation.

CSP developed this Draft WW Management Plan (Draft WWMP) based primarily on the “Proposed Whitewater Recreation Management Plan for the North Fork and Middle Fork of the American River, California, March, 1986.” Using the information developed in the 1986 proposed plan, with the assistance of consultants, CSP conducted 14 meetings with an advisory group consisting of commercial outfitters, non-commercial boaters, conservation group representatives, resource agencies (Reclamation, Bureau of Land Management, US Forest Service, California Department of Fish and Game [now Wildlife], California Department of Forestry) and the California Highway Patrol. Input from this advisory group informed the Draft WWMP.

The purpose and goals of the Draft WWMP, in the context of carrying capacity and observed use patterns, were to develop estimates of appropriate recreational use levels, to develop appropriate user pattern requirements, to develop a whitewater permitting process that would maintain desired recreational use levels, to develop coordination amongst agencies, and to simplify the permitting process.

The Draft WWMP summarizes much of the information from the Proposed Plan, including the characteristics of the WW recreation resources on the NF and MF, levels and patterns of use, current management, management problems and user conflicts and proposed facility improvements at put-ins and take-outs.

The Draft WWMP then defines 34 objectives for WW management, some general and some specific to the NF or MF. Among these many objectives is the recognition of the value of the WW recreation resource; using environmental, facility, physical and social factors in developing carrying capacity estimates; using carrying capacity concepts to

establish recommended use levels; and employing the concept of User Contact thresholds and developing standards to achieve “optimal public use” which balances maximized use and quality recreational experiences. The Draft WWMP also reiterates and establishes the Moderate Contact threshold for both the NF and MF.

North Fork Allocation

To achieve the Moderate Contact objective, the Draft WWMP estimates the standard for number of rafts at one time at select indicator locations: the commercial and non-commercial put-ins at Iowa Hill Bridge, Chamberlin Falls and at the Ponderosa take-out. Using these standards for the indicator locations, the Draft WWMP developed an overall estimated capacity of 3.5 groups per hour. Based on survey data from past years, the Draft WWMP estimated the non-commercial unaffected use demand as 9 groups per day. There is no limit on non-commercial use, but using the estimated demand for non-commercial use, the Draft WWMP did establish:

- the commercial use limit of 11 group starts per day with 1 non-profit/institutional group start per day.

It is interesting to note that the Draft WWMP originally proposed an allocation of 6 trips per day with no assigned start times for commercial use, but outfitters expressed a desire for an increased number of starts by regulating start times. Start times were initially set at 20 minute intervals which accommodate 15 trip starts per day. However, CSP observed the outfitters consistently could not make start times separated by only 20 minutes, so the plan extended the start time interval to 30 minutes and reduced the total trip starts to 11.

The Draft WWMP also established trip size limits:

- 4 boats total per day per outfitter, trip/start limit of 2 boats per trip and a limit of 7 persons per raft including guide.

Middle Fork Allocation

Similar to the NF, based on observations and survey information, the Draft WWMP estimates a standard for the number of rafts at one time and a time delay at various indicator locations in order to meet the Moderate Contact objective.

- Oxbow put-in – 6 groups at one time.
- Tunnel Chute – 25 rafts total in the eddy to scout the rapid.
- Ruck-a-Chucky portage – 30 minute delay for portage

Because a large flood event in February 1986 caused changes to the access roads and facilities at Ruck-a-chucky, the Draft WWMP determined it was not necessary to impose a commercial allocation limit immediately. Instead, when use patterns or facility capacities

warranted a commercial allocation limit, the Draft WWMP objectives would be utilized to establish limits on control days.⁵ The Draft WWMP did establish a trip size limit:

- 5 paddle rafts or 4 paddle rafts and 2 oar rafts (6 total) and a maximum of 7 person in a paddle boat and 2 person in an oar boat.

The Draft WWMP defined a number of items regarding the permit system for commercial outfitters including: a reallocation process; how use is allocated among commercial outfitters; defining different classes of outfitters (high volume, low volume, institutional/non-profit); permit application process; lottery process for start dates; start date schedule and pre-season start date trading; performance, training and equipment requirements; and shuttle requirements.

The Draft WWMP described a multi-tier system of allocating use to both high volume and low volume large outfitters and low volume small outfitters. This “two-tier” allocation system and classification of outfitters was abandoned shortly after the Draft WWMP was developed. The current WW management program does not use “tiers” or different classes of outfitters. Each outfitters allocation of trip starts is based on their recent past actual use (past 3 years on NF and past 6 years on MF).

The Draft WWMP also described the development of an Advisory Task Force composed of CSP staff, commercial outfitters, non-commercial boaters, environmental groups and other agencies. The task force was to meet annually to review WW management and to address any problems.

Much of how the current WW management program is operated comes from the guidelines and direction in the Draft WWMP (which was adopted in the IRMP, described below).

V. Auburn State Recreation Area, Interim Resource Management Plan, September 1992, U.S. Bureau of Reclamation.

The IRMP was prepared by CSP staff for Reclamation and is the current management framework for the entire unit. The IRMP was developed because construction of the Auburn Dam had been put on hold for an indefinite period and the two agencies were managing a river-based recreation resource and not a reservoir-based recreation area.

The IRMP has a section on the Whitewater Management Program (pages 130-142). The IRMP states:

“The WWMP (Whitewater Management Plan) for the North and Middle Forks of the American River was developed under a separate planning process than the rest of the IRMP. This program provides a context for making management decisions for the 15 and 24 miles respectively of whitewater recreational

⁵ Drivers Flat Road, the access to the take-out, and facilities at the take-out were repaired and have been improved over the years. With use returning to previous levels, the need to establish commercial use limits on the Tunnel Chute run returned and daily use limits were re-established.

resources along the North and Middle Forks (plate 12). A draft WWMP was developed and implemented in 1987. This IRMP adopts and finalizes the guidelines and standards developed in the draft WWMP and presents these in their final form in this chapter.”

The IRMP then re-states thirty three of the thirty four objectives from the Draft WWMP. The one objective that was left out of the IRMP had to do with the importance of the fishery resource on the Middle Fork. Fishing is addressed elsewhere within the IRMP.

The IRMP re-iterates the Moderate Contact user threshold for both the NF and MF. The IRMP also includes guidelines identifying key indicator locations and the standard for each:

North Fork

- Iowa Hill Non-commercial – 12 rafts along bank or in water at one time, 9 boats in lower staging area at one time, 8 boats in parking lot at one time.
- Iowa Hill Commercial put-in – 4 groups staging at one time, 20 rafts on bank at one time (stacked rafts can count as one), 3 client groups on site at one time.
- Chamberlin Falls – 30 minute delay in trip.
- Ponderosa take-out – 8 groups at one time, or 3 commercial client groups, or 10-15 inflated rafts at one time (stacked rafts can count as one).

Middle Fork

- Oxbow put-in – 6 groups at one time.
- Tunnel Chute – 25 rafts in the eddy at one time.
- Ruck-a-Chucky portage – 30 minute delay in trip.

The IRMP reiterates much of the use allocation information in the Draft WWMP, including the 3.5 groups per hour capacity estimate for the NF, and that outfitter representatives agreed to a specific number of daily starts and specific start times. The IRMP indicates the start times would be strictly enforced and that spacing between start times would be increased if start times were not met consistently.

On the MF, the IRMP indicates that weekend use has historically exceeded the maximum number of acceptable users and that outfitters agreed to limit the number of trips on weekends, but no specific start times would be established.

The IRMP also describes the formation of an Advisory Task Force composed of CSP staff, commercial outfitters, non-commercial boaters, environmental groups and other agencies. The task force was to meet annually to review WW management objective information and to aid in resolving any issues.

VI. Current Whitewater Management Program

As with the IRMP, the current limits and requirements of WW use on the NF or MF apply only to commercial WW outfitters or non-profit/institutional outfitter. There are currently no limits on non-commercial whitewater use. All commercial outfitters must obtain a WW concession contract annually from CSP, which replaces the permit system proposed in the Draft WWMP. There are 5 commercial runs within ASRA:

1. NF Class IV – Iowa Hill Bridge to Ponderosa Crossing
2. NF Class II – Ponderosa Crossing to Upper Lake Clementine
3. MF Class IV - Oxbow Powerhouse to Greenwood/Ruck-a-chucky
4. MF Class II – Greenwood/Ruck-a-Chucky to Mammoth Bar/Confluence
5. Lower NF/Confluence Class II – Confluence to Oregon Bar

Each of these runs has specific commercial outfitter concession contract requirements. The daily use limits for commercial use apply only to control days, which consist primarily of weekends and holidays in the peak WW season for each run. Outside of the control days, there are no daily limits on commercial WW use. New control days, such as Fridays during the peaks season, may be established if commercial WW use, measured through boat counts and monitoring, begins to approach or exceed the daily use limits. The trip size limits apply to commercial outfitters whenever they use the river.

CSP collects fees from the outfitters through the concession contracts. The revenue from the concession contract fees helps fund the operation and maintenance of the WW program at ASRA.

1. **NF Class IV** – Chamberlin Falls Run – Iowa Hill Bridge to Ponderosa

(Note: commercial use cannot take out at Yankee Jims)

- 14 starts (trips)/day. Starts have assigned time and there is a 40 minute window in which the outfitter trip must launch. Control days: weekends in the whitewater season – April-June.
- Trip and start size = 4 rafts/boats max per start/trip, 2 boats minimum, 28 people total including guides. For trips including clients kayaking, up to three kayaks can be substituted per one raft.
- The commercial trip start times are from 8:40am to 11:0am and from 12:30pm to 2:30pm. The period from 11:05am to 12:30pm is reserved for non-commercial trip starts. There is also an “institutional/non-profit” (e.g. Sac State, UC Davis outdoor programs) launch window at the end of the non-commercial only window. If this window is not claimed by an institution/non-profit, it can be utilized by outfitters.
- Up to 2 safety kayakers may accompany each trip regardless of flow level. On flows above 3,000 cfs, an additional safety raft may be added to a trip.

2. **NF Class II** – Yankee Jims Bridge or Ponderosa Crossing to Upper Lake Clementine.

- Trip Size = Maximum 14 persons per trip, including guides. Maximum of 4 rafts or 10 single kayaks or 3 tandem kayaks and 2 guide/instructor kayaks per commercial trip.

Discussion

The current limits on the number of commercial trips are largely consistent with the Draft WWMP and the IRMP Moderate Contact objective. The Draft WWMP recommended a lower limit of 11 commercial trips per day on the Chamberlin Falls Run, but a longer interval between starts of 30 minutes. The Draft WWMP discusses a period when the start times were 20 minutes and there were 15 trips per day. The current limit of 14 works well. The purpose of the daily trip limits and the designated start times is to achieve the “moderate contact” objective while still maximizing recreation used. The trip size limit (4 boats/trip) is consistent with the Draft WWMP and the IRMP.

3. **MF Class IV** – Tunnel Chute Run – Oxbow to Greenwood/Ruck-a-chucky.

- 60 rafts/boats, 300 clients (360 people, including guides)
- 25 starts/day (25 X 2 rafts/start = 50, plus the extra 10 boat pool = 60 boats). Control days are primarily weekends and holidays in the WW season – roughly Mid-May-September.
- There is an extra 10 boat/day pool from which outfitter may request additional boats for a trip ahead of their start date. This allows 10 additional boats, but no additional clients. The original purpose of the extra boat pool was to allow for additional gear boats for trips, but it can be used for paddle rafts as well.
- Start size = 2 boats/rafts per start, 14 people total (12 clients).
- Trip size = 5 boats, 35 persons max (30 clients) – or - 6 boats max (any combo of oar/paddle rafts), 36 people total (30 clients). 2 boat min. Outfitters can combine individual starts into single trips up to the limit.
- No specified start time slots on MF, though there is often a limited window of boatable flows of 3 to 4 hours in the morning.
- There is a 30% allocation limit of the total commercial use for any single outfitter, which assures there will be at least several outfitters offering a variety of trips to the public.

4. **MF Class II** – Greenwood Bridge site to Mammoth Bar, or to the Confluence.

- There are currently no control days or daily use limits.
- Trip size limits – 5 rafts and 35 people maximum or 6 rafts and 36 people maximum (including guides). Two kayaks (single or tandem) may be substituted per raft. The maximum number of kayaks per trip is 12 with no rafts.

Discussion

The current daily limits for the Class IV Tunnel Chute run on the Middle Fork of 60 boats and 360 people is more generous than the daily limit of 10 commercial trips in the Proposed Plan. The current trip size limit (5/6 boats) for both the Class IV and II runs is the same as proposed in the Proposed Plan and the Draft WWMP, and complies with the IRMP's Oxbow put-in indicator standard of 6 boats at one time.

5. **Lower North Fork** – Confluence to Oregon Bar. There are currently no daily total use limits for commercial use on this run.

- Trip Size – maximum of 4 rafts, or 10 single kayaks, or 3 tandem canoe/kayaks accompanied by 2 instructor/guide single canoe/kayaks.
- Maximum of 24 people per trip, including guides.

Discussion

This stretch of the river was reopened in 2008 and private WW use resumed. Commercial use has been incorporated into the WW management program on a pilot basis. Thus far, interest by commercial outfitters has been relatively low, as has the amount of commercial use. While there are trip size limits, there is currently no total daily limit.

Other Requirements for Commercial Outfitters Applicable to Both NF and MF

- Open outfitter concession contract system. Any qualified outfitter can apply for a WW concession contract. Even with this “open” system, the number of outfitters has decreased over the years.
- All commercial outfitter must meet certain minimum requirements and obtain a concession contract from CSP.
- The % of use on control date starts is allocated annually to outfitters based on each outfitter's recent past use (past 6 years on MF and past 3 years on NF) compared to total commercial use in that period.
- Specific control day starts are allocated by an annual draw. Each outfitter has an assigned number of starts based on percentage of total starts, which is based on recent past use (see above). Outfitters can transfer or release their assigned start dates.
- Commercial use is allowed on non-control dates (no limits on starts) with a valid concession contract for that whitewater reach. Trip size limits still apply.
- A process is in place to monitor some non-control days (e.g. Fridays in prime whitewater season) to document the frequency when daily capacity limits are exceeded. This will determine if they should become control dates.
- There are also requirements and information related to overnight camping, food safety and disposal of waste.

- Each concession contract includes shuttle requirements and limitations for all of the put-in and take-out locations.
- The WW concession contracts have very clear language and procedures for addressing violations of the provisions of the contract terms and conditions (“defaults”) including defining major and minor defaults, documentation and notice of defaults, State’s remedies for defaults and a dispute process. Having a clear default definitions and procedures has been key to administration and enforcement of the concession contracts.

Whitewater Use Data

The Auburn SRA Whitewater Recreation Office (WRO) collects and maintains data for the WW management program including both commercial and non-commercial use data by day, month and year for the 5 NF and MF runs. This use data includes breakdowns of clients, guides, rafts, kayaks and other craft. The commercial use data is derived from outfitter trip reports, compliance monitoring and surveys, and counts of private use.

The WRO documents on-site observations at Oxbow, Tunnel Chute and Ruck-a-chucky to assess wait times at critical choke points. The WRO has conducted outfitter client surveys on the MF and has non-commercial boater surveys from the NF. Both surveys include basic user data and questions regarding satisfaction.

Data is used for a variety of purposes, including: ensuring compliance with commercial outfitter concession contracts, for establishing the annual allocations among outfitters of trip starts on control days, and in making determinations when new control days need to be established in order to meet the management objectives and standards.

Discussion

While based on the Draft WWMP, the whitewater program has taken an adaptive management approach over the years, relying on use data, a close collaboration with outfitters, testing changes during pilot periods and monitoring results.

CSP works with the outfitters to make adjustments, such as the daily trip limits and start time intervals to achieve the management objectives while meeting commercial operator needs. The current limits and start time intervals are consistent with the objectives and guidelines of the IRMP.

CSP is always open to meeting with non-commercial boaters and other interests when requested; however, the current system generates few complaints from the public.

A key element of the WW management program has been river patrols. These patrols have been essential not only to monitor and manage commercial WW use, but also to address other problems and issues along the river(s) including medical emergencies, addressing river hazards, illegal camping, unauthorized OHV use, illegal mining, illegal fishing and trash dumping.