

Project Identification - PMIS 243351

Project Title: Comprehensive River Management Plan

Project Total Cost: \$50,000.00

Park/Unit: Saint Croix National Scenic River

Region: Midwest

Description

SACN is seeking funding to develop a comprehensive river management plan (CRMP) for its 230 river miles. The CRMP will set long term goals and implementation strategies to address development of lands and facilities, visitor user capacities, and other management practices that are necessary to achieve the protection and enhancement of the Namekagon and St. Croix Rivers (SACN) and their fundamental resources and values (FRV) and the outstandingly remarkable values (ORV) per the Wild and Scenic Rivers Act.

This project would proceed in two phases. 1. Preliminary project planning / pre-NEPA services (Component A) to clarify issues, identify data needs, review previous guidance, and confirm next steps for planning and/or interim management actions. 2. CRMP development (planning-ready / NEPA-ready), if recommended, would follow the conclusion of Phase 1.

This planning effort was identified in the park Foundation Document as a high priority planning need.

Justifications

For each WSR designated by Congress and assigned to the NPS for administration, the NPS must prepare a CRMP and other appropriate planning documents to address resource protection, the development of lands and facilities, user capacities, and other management practices necessary or desirable to achieve the purposes of the WSRA. Each river's CRMP includes, at a minimum, those provisions stipulated in sections 3(d)(1) and 10(a) of the WSRA ([16 USC 1274\(d\)\(1\)](#) and [1281\(a\)](#)) that outline comprehensive plan requirements. CRMPs may also include such other provisions as may be needed to satisfy the objective of chapter 2, "Park System Planning," of NPS [Management Policies](#) (2006) and the unique circumstances of the river.

The river management plan is needed in order to better/more effectively align visitor opportunities with protecting the park's outstandingly remarkable values and associated resources. Outstandingly remarkable values have regulatory and statutory significance under Section 7(a) protected by the WSRA. Issues to be considered and addressed include uncontrolled visitation, visitor use conflicts, visitation limits, impacts on natural and cultural resources, facilities, permitting, services, and commercial services. The public planning process will be complex as these issues are of significant concern to stakeholders. Adding to the complexity will be the Park's unique characteristics such as 230 miles of river under NPS management, multiple access points, access points not owned by the NPS, and numerous, large-scale businesses holding Commercial Use Authorizations (CUAs).

The Park had 44 CUAs in 2018, serving over 200,000 visitors and grossing over \$6 million. While many of the CUAs offer traditional experiences at SACN (paddling, tubing, fishing, paddleboat tours), the Park is concerned about the growth of those activities (additional CUA permits, increased CUA customers, expansion of activities into new stretches of river, etc.) and proposals for new activities, as well as whether the increasing visitor numbers are sustainable with existing maintenance and interpretation management policies and practices.

The Park has conducted a few studies focused on: visitor type of use at specific landings (i.e., not whole-park use), visitor frequency of use over a period of time (i.e., summer only, not shoulder or off-seasons), and visitor acceptability of programming and access (i.e., current research and focused on a singular landing). Yet, the Park has not funded any research studies or assessments of whether visitors affect resource conditions and to what extent. Park management has anecdotally noticed significant island and shoreline erosion, with potentially negative impacts on water quality and aquatic, riparian and scenic resources; soil compaction; littering; failure of visitors to comply with sanitation requirements; and soil and vegetation loss (potential impacts on scenery and riparian resources).

Additionally, the Park has neither a Visitor Experience and Resource Protection Plan (VERP), nor a parkwide Visitor Use Study (three previous studies focused on the Namekagon alone). Management areas were defined in the 1998 General Management Plan and 2001 Cooperative Management Plan but the development of standards, indicators, and management actions, and related monitoring or evaluation, has not occurred. Limited or no research has been conducted on 1) visitor use or degradation of

resources, 2) impacts of visitor use trends on visitor experiences, or 3) improving management activities to reduce resource impairment and sustain NPS infrastructure.

According to the General Management Plan (GMP) for the upper St. Croix and Namekagon Rivers (NPS, 1998), the upper Riverway is significant because "visitors have extended opportunities to experience the solitude and beauty inherent in the Riverway's exceptional natural resources." The Cooperative Management Plan (CMP) for the lower Riverway makes a similar statement, pointing out that one of the purposes of the lower Riverway is to "provide an environment that allows the opportunity for peace and solitude" (NPS, et al., 2001). The character of the Riverway changes over its 230-mile course from a narrow, intimate and wadeable stream at the headwaters to a deep, wide floodplain river nearer the confluence with the Mississippi River. Water-based recreational opportunities are varied and include canoeing, kayaking, inner-tubing, fishing, tour boating, and motor-boating. Primitive shoreline camping is offered at approximately 150 campsites along the Riverway. Hand-in-hand with these activities are the commercial services that support them.

The upper Riverway GMP identified inner tubing as a concern in 1998 and the lower Riverway CMP identified the need to address user carrying capacity in 2001. The Riverway's 2017 Foundation Document identifies "uncontrolled visitor use" as a "key issue." The NPS Management Policies state that the Superintendent "will develop and implement visitor use management plans" (NPS, 2006). Despite this guidance, a visitor use management plan has not yet been developed for the Riverway. In recent years, formal and informal complaints to the Superintendent about crowding, litter, and conflicts with other visitors seemed to increase. At least on busy summer weekends, visitation levels on these heavily used stretches of river are not in keeping with the significance statements in the GMP and CMP and are difficult to manage given existing staff levels and facilities. Use on other stretches of river is likely growing and inner-tubing seems to be spreading; while some stretches of the river are only very lightly used, mostly due to low water conditions during the height of the recreation season.

Measurable Results

SACN is seeking preliminary project planning funding / pre-NEPA services for a CRMP of the 230 river-miles. The preliminary project planning process will clarify and confirm the scope of park issues and opportunities, identify data needs and availability, review previous guidance and decisions, and confirm next steps in the planning process and/or interim management actions to address project issues (including NEPA pathways and civic engagement needs).

If recommended in the preliminary project planning completion report, SACN will seek planning funds for a comprehensive river management plan. The planning process will result in a comprehensive river management plan and environmental assessment for SACN. The plan would address all issues known to date, which include user capacities, commercial service permitting, water quality and quantity, cultural and natural resource issues, infrastructure changes such as access points, and overall visitor use management. The subsequent environmental assessment would evaluate alternatives to address the issues and guide decision making.

Unit Management Plan fund source criteria:

1. Significance of Planning Issue or Opportunity and Preliminary Range of Issues and Potential Management Actions
SACN lacks the tools to fully understand visitor use issues and lacks strategies to effectively manage visitor use and its impacts. Since 1998, planning documents have identified inner tubing, user carrying capacity, and uncontrolled visitor use as key issues. In some areas visitor capacities are likely being exceeded or are close to being exceeded. While plans identify desired visitor experiences and resource conditions, no indicators or monitoring protocols have been developed or implemented. Formal and informal complaints about crowding (on the river, at landings), litter (in the river), shoreline erosion (from the numbers of visitors accessing the river; from boat wakes), campsite degradation (soil compaction; vegetation being cut), disruptive behavior, and conflicts between visitors are increasing. These are indicators of a need for a change in management direction to align visitor opportunities and experiences with the park's purpose and significance.

This planning effort is needed to align visitor opportunities with protecting fundamental resources and values, and ensure compliance with the WSRA with the development of a CRMP. Issues to be considered and addressed include:

- Evaluation of existing data and data gaps to help inform management decisions
- Uncontrolled visitation
- Visitor use conflicts;
- Visitation limits/capacity as required by the WSRA;

- Facilities and development;
- Permitting and commercial services (e.g., determine how to involve outfitters for resource protection, education, interpretation, enforcement);
- Resource preservation and monitoring protocols;
- Goals and desired future conditions to protect free-flowing condition, water quality, and ORVs of the specific river segments;
- Framework for development and activities on federal lands in the river corridor
- And monitoring strategy specifically related to protecting the free-flowing condition, water quality and ORVs of the river

2. Urgency/Severity of Planning Issue/Opportunity

Increased visitor use at particular landings and along certain river stretches has been a concern at SACN since the 1990s. Over the past five years, new recreational activities and the expansion of some recreational activities into new areas has added complexity to visitor use issues. Certain stretches of the Riverway now have a reputation as party locations with an “anything goes” atmosphere – a reputation difficult to rein in and one attracting even greater numbers of visitors looking for that type of experience. Concerns are focused on the negative impacts of use on visitor experience, natural resources, NPS infrastructure, and NPS operations. Coupled with limited staff and budget, the park lacks the tools to fully understand visitor use issues and lacks strategies to effectively manage visitor use and its impacts.

Section 3(d)(1) of the Wild & Scenic Rivers Act directs federal river-administering agencies to “address...user capacities” in a comprehensive river management plan prepared for each federally administered component of the National Wild and Scenic Rivers System. Addressing user capacities is an integral aspect of the management direction identified in a CRMP to protect and enhance “river values” while providing for public use and enjoyment of the designated river.

Facing new and/or increased visitor use without an understanding of carrying capacity, the NPS cannot effectively manage for desired resource conditions and visitor experiences. Conditions on summer weekends have prompted questions from the public about what the NPS intends to do about crowding, noise, litter, and conflicts between users and suggestions for revising the general management plan. CUAs have expressed concerns about the impacts of visitor use issues on their business. The planning effort will help the park evaluate the commercial visitor service activity and determine whether the services are necessary and appropriate for public use and enjoyment of the park, which determination meets applicable requirements for issuance under a concession contract, or whether determined suitable commercial services and therefore subject to authorization under a CUA. 54 U.S.C. § 101925 (PL 105-391 Sec 418(2)(A)): (2) *Elements of authorizations. The Secretary shall: (D) have no authority under this section to issue more authorizations than are consistent with the preservation and proper management of park resources and values, and shall establish such other conditions for issuance of such an authorization as the Secretary determines appropriate for the protection of visitors, provision of adequate and appropriate visitor services, and protection and proper management of the resources and values of the park.* The Service must manage commercial visitor services to protect visitors and provide for their enjoyment, as well as protect the resources and the values of the park and purposes for which it was established. Without a framework for addressing user capacities and effectively managing for protection of river values, and without reasoned, defensible logic, SACN may face litigation. The park is in clear need of management direction based on the number of issues facing the park.

Given the number of river miles (230), number of access points (70 total, 50 NPS-owned), number of campsites (150), overlapping jurisdictions (state, federal), number of CUAs (44 in 2018), adjacent Riverway communities, and the nature of visitation (dispersed, seasonal), a CRMP will be a complex planning and decision-making process.

3. Objectives for the Undertaking

The preliminary project planning process will clarify and confirm scope of park issues and opportunities, identify data needs and availability, review previous guidance and decisions, and confirm next steps in the planning process and/or interim management actions to address project issues (including NEPA pathways and civic engagement needs).

Specifically, SACN needs assistance to understand the scope and severity of visitor use issues, impacts on resource conditions and visitor experiences, and alternatives for developing a strategy for improved management. The park has invested in several river monitoring studies (1999, 2002, 2015) and in observational research (2017) and a visitor survey focused on one river landing (2018, report pending). It needs expertise to supplement these efforts (if needed) and then move forward from data gathering.

There are presently a few problem areas of heavy use that need to be addressed. Management strategies to consider could include segmenting use based on equipment, type, season, numbers, etc. Because of the patchwork of ownership and multitude of access points, it is unclear what options truly exist to manage these issues. Managing visitor use would be a huge enforcement issue and difficult to implement. The preliminary planning effort will assist the park in understanding the scope of the issues and areas needing management guidance through the use of a CRMP.

4. Need for Management Direction in Response to New Designations or Formal Directives

The park is an established Unit. This project does not address legislation or other formal directive necessitating change in management direction. The parks planning portfolio is lacking in management direction for certain components of a CRMP as required under the WSRA.

NOTE: Supporting Studies

General Management Plan, Upper St. Croix & Namekagon, 1998

Cooperative Management Plan, Lower St. Croix NSR, 2001

Foundation Document with River Values Report, 2017

Camping Management Plan, Lower St. Croix, 2007

Business Plan, 2003

River Use Monitoring, 1999, 2002, 2015

Observational Research at Three Landings, 2017

Visitor Survey, Osceola Landing, 2018 (awaiting report)

This section has been updated to reflect the criteria for NEPA services. See yellow highlighted section.

EQD criteria – Pre-NEPA Services

1. Include a description of how the proposed project meets one or more of the following three evaluation criteria:

a. Preparation of environmental impact analysis is legislatively mandated, subject to a court order or likely to be litigated.

SACN was designated a wild and scenic river in 1968 (Namekagon and Upper St. Croix River) and 1972 (Lower St. Croix River) with the passing of the Wild and Scenic River Act. The Upper St. Croix and Namekagon are classified as scenic. The upper 10 miles of the Lower St. Croix are classified as scenic; the lower 42 miles of the Lower St. Croix are classified as recreational. Under the 2(a)ii designation, Minnesota and Wisconsin have the responsibility to manage the lowest 25 miles from Taylor Falls to the confluence with the Mississippi. State-managed portions of the river do not require comprehensive river management plan. The NPS manages the upper 27 miles of the Lower St. Croix and the entire 200 miles of the Upper St. Croix and the Namekagon, totaling 230 river miles. The NPS CRMP would need to collaborate with Minnesota and Wisconsin Department of Natural Resources to ensure consistency in management actions between the NPS and state 2(a)ii designation.

The NPS is charged, to manage the river to protect and enhance the values for which it was designated - the free flow, water quality, and outstandingly remarkable values. Section 10(a) of the WSRA (16 USC 1281(a)) directs managers to protect and enhance these values "without, insofar as is consistent therewith, limiting other uses that do not substantially interfere with public use and enjoyment of these values." The "protect and enhance" language of section 10(a) is interpreted in the Secretary of the Interior and Secretary of Agriculture's Final Revised Guidelines for Eligibility, Classification and Management of River Areas, 47 Fed. Reg. 39454 (Interagency Guidelines) as "a non-degradation and enhancement policy for all designated river areas, regardless of classification."

Director's Order 46: Wild and Scenic Rivers Management provides an additional direction to WSR parks to develop CRMP's in accordance with the law. Comprehensive River Management Plans (CRMPs) shall address resource protection, development of lands and facilities, user capacities, and other practices necessary or desirable to achieve purposes for which SACN was established. The Lower SACN has a cooperative management plan from 2001 which satisfies the WSRA requirements for a 2(a)ii state administered wild and scenic river. This plan is currently being evaluated by MWR Planning to ensure management guidance is still appropriate and if the SACN superintendent is a voting member on the Lower St. Croix Management Commission. Written agreements or other instruments are authorized to implement CRMPs in partnership with States, local governments, their appointed councils, committees and non-governmental organizations consistent with sections 10(e) and 11(b)(1) of the WSRA (16 USC [1281\(e\)](#) and [1282\(b\)\(1\)](#)), and each river's enabling legislation.

The upper 27 miles of the Lower St. Croix and the entire 200 miles of the Upper St. Croix and Namekagon do not have a CMRP. Over the past two decades there has been an increase in visitor use and recreational activities in and along the NPS managed portions of the SACN.

In 1998, SACN completed an overarching management for the Upper St. Croix and Namekagon. The plan provided the purpose, significance, and mission goals. However, it did not provide the required next tiered steps to provide long-term management of visitor, resources, and the outstandingly remarkable values (ORVs). The 1998 plan identified management areas but failed to determine how goals and desired future conditions are to be achieved, nor did it develop the needed standards, indicators, management actions and related monitoring protocols which are necessary for measuring success towards achieving those desired future conditions. The desired future conditions were overly broad, any standards and indicators would be limited in application with such a broad mandate. The 1998 plan did not meet the CRMP requirements.

Since 1998 the park has experienced rapid growth in river uses and visitor users. This expansion was not envisioned to the degree it has occurred. Resource and visitor use issues include uncontrolled visitation, visitor use conflicts, and impacts on natural and cultural resources, facilities, permitting, services, and commercial services. Impacts to natural resources include anecdotal evidence of significant island and shoreline erosion, with the potential adverse impact on water quality including turbidity and sedimentation, aquatic, riparian, and scenic resources; soil compaction; visitor littering; failure of visitors to comply with sanitation requirements; and vegetation loss/trampling,

The CRMP would define desired future conditions for outstandingly remarkable values, other resources, visitors, permitting/commercial services, and development. This would allow the park to also develop the necessary standards, indicators, monitoring protocols, and management actions to achieve and/or maintain those desired future conditions. On its surface this appears to be a visitor use planning issue, however, the complexity of the land ownership, affected stakeholders, including the public and holders of commercial use authorizations demonstrate there is a considerable complexity. At its current trajectory the park is unable to achieve a cohesive harmony between resource needs and expanding visitor users and uses. This plan will identify where management actions are needed to ensure the long-term preservation of the river's outstandingly remarkable values. Assistance from EQD with Pre-NEPA services will help ensure the project scope is appropriate and development of a strategy for next steps.

b. Park or program specific issues requiring decisions that could represent a Servicewide precedent or model.

SACN is one of the original eight designated Wild and Scenic Rivers. SACN through planning and Section 7 water resource project evaluations, SACN has established many precedent and policy setting actions. SACN continues to set standards for WSR management and implementation of WSRA (section 7(a) etc).

c. High-priority resource management or policy issues expected to involve a complex NEPA planning and decision-making process.

The linear nature of the SACN adds another layer of complexity to the NEPA planning and decision-making process. Given the number of river miles (230), number of access points (70 total, 50 NPS-owned), number of campsites (150), overlapping jurisdictions (state, federal), number of CUAs (44 in 2018), adjacent Riverway communities, and the nature of visitation (dispersed, seasonal), a CRMP will be a complex planning and decision-making process.

The complexity of the land ownership, affected stakeholders, including the public and holders of commercial use authorizations demonstrate there is a considerable complexity and certain controversy. This planning effort has the potential for litigation from stakeholders such as visitors, affected landowners, and business operators within the SACN. At its current trajectory the park is unable to achieve a cohesive harmony between resource needs and expanding visitor users and uses. This plan will identify management actions which are consistent with the Wild and Scenic Rivers Act while providing unique and enhanced visitor experiences.

2. If applying for support for NEPA services

Demonstrate readiness by providing a preliminary project planning completion report that summarizes the preliminary project planning process that occurred, describes issues/opportunities and reasons for the planning project, summarizes existing guidance to address issues/opportunities, and recommends next steps to further the project and address the issues/opportunities.

SACN initiated and completed the preliminary project planning process in 2020. Project initiation started with Denver Service Center interdisciplinary team discussions with SACN and regional staff to discuss preliminary issues and review planning and

policy guidance. These conversations informed the development of the preliminary issues identification and assessments for all relevant topic areas. A three-day preliminary project planning workshop was conducted in October 2020 digitally via video conferencing. The completion report recommends developing a Comprehensive River Management Plan. The completion report is attached.

Demonstrate that all reasonably foreseeable supporting data/information needed for the planning process has or will be obtained prior to initiation of the planning process.

The preliminary project planning completion report recommends the following technical assistance tasks be completed prior to initiating planning:

Technical Assistance Task 1A: Desired Conditions

Technical Assistance Task 1B: Develop Indicators and Thresholds for River Values.

Technical Assistance Task 2: Necessary and Appropriate Criteria for Commercial Services.

Technical Assistance Task 3: Civic Engagement (Optional).

Technical Assistance Task 4: Strategic Facility Investment Plan (optional).

The recommended technical assistance pieces and data collection pieces can be accomplished on relatively short timeframes (less than 24 months). Therefore, SACN could commence planning on this project as early as FY23.

3. If applying for support for pre-NEPA services:

a. Identify the preliminary range of issues and potential management actions that the park intends to review during the pre-NEPA process

This planning effort is needed to align visitor opportunities with protecting fundamental resources and values, and ensure compliance with the WSRA with the development of a CRMP. Issues to be considered and addressed include:

- Uncontrolled visitation;
- Visitor use conflicts;
- Visitation limits/capacity as required by the WSRA;
- Facilities and development;
- Permitting and commercial services (e.g., determine how to involve outfitters for resource protection, education, interpretation, enforcement);
- Resource preservation and monitoring protocols;
- Goals and desired future conditions to protect free-flowing condition, water quality, and ORVs of the specific river segments;
- Framework for development and activities on federal lands in the river corridor
- And monitoring strategy specifically related to protecting the free-flowing condition, water quality and ORVs of the river

There are presently a few problem areas of heavy use that need to be addressed. Management strategies to consider could include segmenting use based on equipment, type, season, numbers, etc. Because of the patchwork of ownership and multitude of access points, it is unclear what options truly exist to manage these issues. Managing visitor use would be a huge enforcement issue and difficult to implement.

b. Provide an annotated list of the primary scientific and other supporting studies that have been completed and identify any ongoing, planned, or needed background studies that will be used to inform the project. Below includes a list of existing management plans and studies which will be used to support the Pre-NEPA services.

- General Management Plan, Upper St. Croix & Namekagon, 1998
- Cooperative Management Plan, Lower St. Croix NSR, 2001
- Foundation Document with River Values Report, 2017
- Camping Management Plan, Lower St. Croix, 2007
- Business Plan, 2003
- River Use Monitoring, 1999, 2002, 2015
- Observational Research at Three Landings, 2017
- Visitor Survey, Osceola Landing, 2018 (awaiting report)

- Superintendent Compendium