



American Packrafting Association

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Superintendent Dave Uberuaga
Wilderness Coordinator Linda Jalbert
Grand Canyon National Park
Box 129
Grand Canyon, AZ 86023

RE: Packrafting in Grand Canyon National Park

Dear Mr. Uberuaga and Ms. Jalbert,

I am writing to introduce the American Packrafting Association to you. The APA formed in 2012 to promote the safe and responsible use of packrafts on wild rivers across America and around the world. The APA currently represents 400 members in twenty countries, and the activity and organization are growing rapidly.

Packrafting involves the use of small, lightweight and portable rafts to access remote rivers, creeks, lakes, and streams. Packrafting is inherently low-impact, requiring no additional infrastructure such as roads, boat launches, or even trails. Packrafting can be practiced safely by people of all abilities and expert boaters regularly use packrafts on Class IV and V technical whitewater.

APA is aware that Grand Canyon NP is evaluating the regulations governing use of packrafts, and we wish to submit our perspective for consideration. American Packrafting Association (APA) would like to see packrafting embraced by the Park Service and other users as a legitimate and appropriate recreational use of Grand Canyon National Park (GCNP). APA is eager to listen to the concerns of GCNP and other user groups, and adapt its position to maximize the preservation of the resource and the experiences/expectations of other user groups. APA believes that packrafters can coexist with wildlife, backpackers, canyoneers, and river runners.

1. APA requests packrafting use in GCNP in the following ways:
 - a. As satellite craft on regular multi-day river trips with larger support rafts (similar to inflatable kayaks or hard shell kayaks).
 - b. As packrafting parties floating from Lees Ferry to Diamond or Pearce Ferry on a lottery permit, without support from larger rafts, subject to the same regulations as regular river parties.
 - c. As packrafting parties on a lottery permit with itineraries that involve hiking or canyoneering as well as river running according to backcountry regulations and river regulations. These

itineraries may involve multiple launches and take-outs at locations other than Lees Ferry, Diamond Creek, or Pearce Ferry.

- d. As packrafting parties floating the river on a backcountry permit to connect backpacking and canyoneering itineraries according to new packrafting regulations (see APA proposals throughout this document).
- e. As packrafting parties on one-day itineraries that involve hiking, canyoneering, and river running, in compliance with zone regulations, in areas such as (but not limited to) Marble Canyon and Middle Granite Gorge. APA agrees to the requirement that packrafters carry a special one-day packrafting permit for this activity.
- f. Opening GCNP to commercial packraft outfitting and guiding according to Park concessions policy.

2. APA believes that packrafts are appropriate in GCNP for the following reasons:

- a. Packrafting is fun.
- b. Packrafting can be done safely and with minimal resource impacts.
- c. Packrafting allows backcountry travelers to create interesting and adventurous itineraries that combine canyoneering and hiking with river running, which fosters complete appreciation for and experience of Grand Canyon's many facets.
- d. Packrafts enable backpackers and canyoneers to quickly, easily, and enjoyably egress from the mouths of side canyons that are too technical to ascend, and where hiking egress along the river corridor is not feasible.
- e. Packrafts enable backcountry travelers to safely cross the Colorado River during itineraries that include travel on both sides of the river. Packrafts also are useful for river crossings or skirtings to avoid bank obstacles such as canyons and cliffs that prevent reasonable travel along the same bank.
- f. Packrafts help minimize impacts on vegetation and wildlife by keeping backcountry travelers off the sensitive slopes along the river corridor.
- g. Packrafts allow Park visitors to experience the river without the extended time commitment of a full river trip; without the logistical hassles, carbon emissions, and expense of trip preparation and car shuttles; without the complicated, repetitive, and back-breaking packing and unpacking of heavy river equipment.
- h. Packrafting, in various forms, has historical significance in GCNP as a traditional tool for low-impact minimalist adventures, and its pureness and simplicity are in keeping with other traditional uses of the Park.
- i. Packrafting is fully compatible with Leave No Trace principles. Packrafting and packrafters have much less resource damage, noise, visual, and emissions impacts when compared to big river trips, motorboats, mule trains, rim-to-river trams, and helicopter tours.

- j. Packrafts afford access to parts of GCNP where tribal policies block overland access.
3. Packrafts and packrafters have proven in the Grand Canyon, and rivers and streams worldwide, that their crafts and paddling skills are well suited to the demanding whitewater of the Colorado River through Grand Canyon.
 - a. As in any pursuit, lapses in judgment, human error, and accidents are to be expected, and are a part of the learning and maturation process.
 - b. Currently, packrafts are available in several different designs. Some packrafts are designed according to manufacturer's specifications as technical whitewater craft, while others are designed as flat-water craft. While APA encourages packrafters to seek instruction and guided experiences, we are not interested in controlling how and where packrafters use their chosen craft. We hope that the Park Service and other user groups will respect individual freedom in this regard.
 - c. With the exception of rapids that fall within zonal restrictions and closures, APA will not accept rules that dictate which rapids packrafters may or may not run.
 - d. Packrafters can easily portage rapids that they prefer not to run.
4. Regarding equipment, APA agrees that packrafters shall comply with backcountry and river regulations.
5. APA supports the adoption of a "zone system" for the management of packrafting in GCNP. Each zone would be defined along the river by the accessibility to overland and exit routes of the canyon. The zone system would be managed similar to the current zones on a backcountry permit. Each river zone would have its own unique set of allowable uses and should include the number of people in a given zone at a given time.
6. APA supports seasonal variation in the management of packrafting, with less restrictive rules during the winter season when river permit traffic is lower.
7. River Corridor Camping
 - a. Packrafters floating the river on a lottery permit may camp anywhere along the river corridor (subject to current closures and regulations), preferably at official river campsites as defined in the GCNP river campsite list.
 - b. Packrafters floating the river on a backcountry permit may camp anywhere along the river corridor, except at certain sites specified by the Park (in the upcoming plan) that are considered to be choice sites for river running parties.
 - c. Where backcountry regulations do not prevent packrafters from camping, packrafters on backcountry permits must yield to other river users on campsite selection.
 - d. APA will provide education for packrafters about low-impact camping in GCNP.
8. Regarding human waste, packrafters will use wag bags while traveling or camping along the river corridor, and carry them back to the rim. Away from the river corridor, packrafters will be subject to

human waste disposal rules as defined in their backcountry permit. Packrafters will pee in the river when traveling or camping along the river corridor.

Sincerely,

Brad Meiklejohn, President
American Packrafting Association

To learn more about packrafting and the American Packrafting Association, please visit our website at www.packraft.org or find us on Facebook at www.facebook.com/AmericanPackraftingAssociation.