



"At the water's edge...just keep going"

American Packrafting Association

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January 25, 2017

Marcos A. Roybal
Fossil Creek Project Coordinator
Coconino National Forest
Red Rock Ranger District
8375 State Route 179
Sedona, AZ 86351

Dear Marcos Roybal;

We have reviewed the Fossil Creek Wild and Scenic River CRMP proposed actions and alternatives, and appreciate the opportunity to comment on behalf of our 1,300 members and the paddling and conservation communities. The American Packrafting Association (APA) is an international association of paddlers dedicated to the conservation of wild rivers and wild places, promotion of packrafter safety and education, and preservation of packrafting opportunities on wild rivers and in wild places.

We fully appreciate the extreme challenges planners face in writing this CRMP and commend the Coconino National Forest on generating five reasonable and simple alternatives, and sharing them with the public in an open, simple, and organized way. We appreciate the diligent care you have taken to protect this unique and sensitive place, both in the past and in the CRMP alternatives, while delineating sustainable carrying capacities for the area's growing recreational interests.

For APA and its members, Fossil Creek is of paramount importance as a venue for packrafting in the southwestern U.S. because of its uniquely magnificent geology and hydrology, and its rareness as a perennial navigable stream in an otherwise vast dry desert. For packrafters, whose inspiration for outdoor endeavors is born in a desire to ephemerally experience unique and magnificent landscapes like Fossil Creek by paddling or hiking, we not only advocate for the conservation of waterways and the privilege to paddle them, we also care equally about preserving wildness and biodiversity in the landscape through which rivers and trails run. The APA Board and staff have therefore collaborated intensively with local and regional paddlers and hikers, and American Whitewater, to carefully craft our comments below. Bluntly, we strongly favor a combination of alternatives B and C—Enhanced Protections and a Non-Motorized Experience—both to preserve Fossil Creek in a more pristine state, while allowing for managed paddling, hiking, biking, swimming, and camping. However, we will direct our comments toward the preferred alternative—Long-term Adaptive Management—with the intention of steering that plan toward the conservative end of the spectrum.

In general, we are concerned that Alternative E—Long-term Adaptive Management—would give authorities the green light to act and react in Fossil Creek without sufficiently involving stakeholders in the planning/design process, and without committing to a long-range vision for Fossil Creek. If

Alternative E has any vision, it is for building up infrastructure to handle maximum use, rather than envisioning how to preserve and highlight the area's wild, scenic, and recreational attributes. The preferred alternative conjures images of a city-park-like environment, with boardwalks, bridges, picnic tables, benches, fences, and closed signs instead of the quiet backcountry paradise many of us desire. That said, as much as we may romanticize to the contrary, the reality is that Fossil Creek has become too popular, and access to this unique area is too easy, to sustain the impossible dream scenario without further degradation of area resources. Hence, we suggest a downscaled version of the preferred Alternative E that aligns with the following principles:

LOW VISITOR NUMBERS

All of the alternatives, except for Alternative A, propose adjustments to visitor capacities, ranging from 610 People At One Time (PAOT) in Alternative B to 1705 PAOT in Alternative E. We advocate for preserving the wild and scenic quality of Fossil Creek by continuing the current reservation system and capping vehicle and PAOT numbers to Alternative B levels.

Comments

Coconino National Forest implemented a permit system at Fossil Creek in 2016 specifically because of overuse and associated refuse, erosion, and other impacts. Since the implementation of the new reservation system, it has been widely hailed as a resounding success. The outstandingly remarkable values (ORVs) at Fossil Creek have been greatly enhanced by scaling back the number of visitors. Scaling use back up to more than double the current capacity has the potential to reverse the positive progress already made, regardless of new infrastructure that may be added.

Suggested Revision to Preferred Alternative

Limit visitation/PAOT initially, and use a thoughtful adaptive management process that instills LNT ethics to scale back up capacities to Alternative B levels. Improve existing facilities by grading and resurfacing roads and parking areas, and increasing signage, fencing, and trails. Transgressing users can be fined and banned from the area, rather than removing privileges from responsible visitors.

DISASSOCIATE PADDLING from WATER PLAY

None of the alternatives specifically addresses the interests of paddlers, who are lumped under “water play” in the alternatives. Paddlers should not be lumped as such, but rather managed as a separate user group. Paddlers have developed longstanding safety mechanisms, backcountry experience, and Leave No Trace ethics that are rare among everyday inner-tubers and swimmers, etc.

Comments

Paddlers have a long history of recreation and stewardship in Fossil Creek both prior to and since the removal of the hydroelectric dam. Not only is Fossil Creek an exceptional river resource for paddlers because of its extraordinary natural qualities—the only navigable travertine waterway in the United States—it is also of critical importance to the paddling community because of limited alternatives in the dry State of Arizona. Outside of spring run-off events on the Salt and Verde, or Grand Canyon lottery permits, Fossil Creek is the only whitewater waterway in Arizona with year-round flow deep enough for paddling. Hikers and motorists have thousands of other options. Paddlers do not. With the middle stretch of Fossil Creek designated as a “recreational” river under the Wild and Scenic Rivers Act, paddlers request recognition as a unique recreational stakeholder in the management of Fossil Creek, and to be

addressed separately from hikers, swimmers, bicyclists, equestrians, and motorized users during any future Adaptive Management Process.

In the big picture, paddlers are represented by local and national organizations, which have established ethics and codes of conduct, and can wield influence over group behavior. On Fossil Creek, paddlers are likely the most well-equipped and skilled recreationists to visit the area. Paddlers are ordinarily equipped with appropriate clothing and equipment for the river environment, including drysuits, PFDs, helmets, first aid supplies, and high-tech footwear, watercraft, and rescue equipment. Moreover, because paddlers typically train in swift water and high-angle rescue techniques, they can be important allies to Forest Rangers in making the river environment safe and enjoyable for all visitors. While numbers of paddlers should be limited like all other users, paddlers request continuing access, regardless of swimmer accidents and behavior, along the entire length of Fossil Creek, and especially within the Wild and Scenic recreational middle section of Fossil Creek.

Suggested Revision to Preferred Alternative:

The distinct management and enforcement objectives that are warranted for paddling on Fossil Creek could be accomplished by designating the stream as a Blue Trail, similar to the Verde River, but with one significant difference. Because of its small size, Fossil Creek is suitable only for small paddle craft, such as kayaks and packrafts. Hence, no additional infrastructure, such as new trailheads, trailer parking, or boat ramps, would be required. The purpose of the Blue Trail designation would be to recognize and manage paddling as an existing and independent recreational use of Fossil Creek, and to help ensure that paddlers have a seat at the table as an independent stakeholder in the adaptive management process. The Blue Trail designation could include requirements for special paddling permits, standards for paddle craft, minimum standards for training and certification, equipment such as PFDs, helmets, whistles, and throwbags, and mandatory safety practices such as scouting waterfalls.

Also, because many paddlers embark from middle and upper Fossil Creek for multi-day paddling trips that end far downstream on the Verde River, we request a special parking allotment for paddlers who need to leave vehicles overnight for several days. For spur-of-the-moment paddling trips when river flows are high during permit season, perhaps there would be a workable Blue Trail mechanism to save a paddling trip permit or two for online booking two or three days prior to a trip date.

SWIMMING and WATER PLAY ACCESS

Alternatives C, D, and E propose closing “Middle Falls” (aka the Fossil Creek Waterfall) to water play, and building a falls overlook structure instead. Alternatives C and D propose closing access to the Fossil Springs area, and building an overlook at the end of a shortened Flume trail. We advocate for preserving opportunities for swimming and water play throughout Fossil Creek. Utilize your most innovative planning professionals to devise an adaptive management strategy that limits visitation initially, and then scales back up to Alternative B levels, while retraining visitor behavior and instilling Leave No Trace ethics.

Comments

The proposed closures to swimming and water play at Middle Falls and Fossil Springs are not supported by analysis or complete information. We understand that certain areas may have “cultural or natural resource issues,” but any closure would need to comply with CFRs on closures and public use limits (36 CFR 1.5). We have not found any information about user impacts with regard to these resources. Any closure would be highly controversial. If paddlers were lumped with water play, a closure at Middle Falls would be a tremendous loss. The large pool at the base of this class IV rapid has been used for years as a

training ground for local paddlers to practice their swift water rescue skills, eskimo rolls, and waterfall paddling. Such a closure would not be consistent with the management of the central section of Fossil Creek as a recreational Wild and Scenic River. Trail overlooks placed at these sites or far downstream are an inadequate substitute for being able to actually experience the creek and its exceptional and unique travertine waterfalls, whether as a swimmer or paddler.

Suggested Revision to Preferred Alternative

Since no comparative analysis or determination has been completed with regard to opening or closing Middle Falls and Fossil Springs swimming areas, all of Fossil Creek should remain open to swimming and water play. Initially, swimming and water play should be reduced dramatically before scaling back up to Alternative B levels in a thoughtful adaptive management process that engages directly with users to increase backcountry skills and LNT behaviors. If unforeseen challenges arise (at Fossil Springs' "Toilet Bowl" for example), new regulations can be put in place in an adaptive management process, which might include the following:

- Require the use of safety equipment such as PFD, helmet, whistle, and throw-bags in the swimming areas, with fines for non-compliance.
- Restrict or ban specific practices such as "cliff jumping," with fines for non-compliance.
- Add signage with rules and guidelines for swimming and water play in the falls area to promote safety and skills for individual/group impact minimization.

In any case, paddling should be disassociated from the management of swimming and water play, so that if closures to the latter are warranted, paddling would still continue under the Blue Trails management scheme.

MINIMIZE PARKING and INFRASTRUCTURE at REC SITES

A variety of infrastructure projects are proposed in Alternative E, including the following:

- a permanent visitor contact booth, vault toilet and temporary parking at Junction
- installation of bike racks and vault toilets at other key locations
- construction of a vehicle and pedestrian bridge at the Irving site, with installation of picnic tables, parking, boardwalks, and other infrastructure on the north side of the creek
- construction of parking, vault toilet, trash receptacles, and trailhead at Cactus Flat
- construction of a welcome center with interpretive displays, interpretive trail, parking, vault toilet, trash receptacles, and a host-admin site with its own administrative vault toilet at Heinrich

Comments

In general, we support the following:

- construction of permanent visitor contact booths, toilets, and temporary parking at entrance stations
- installation of small facilities such as toilets, picnic tables, and bike racks to reduce user impact
- construction of parking, vault toilets, trash receptacles, and a trailhead at Cactus Flat
- improvement of parking at Homestead and Tonto Bench
- keeping new development out of the Irving area
- elimination of the "waterfall overlook" idea
- ensuring that visitor fees will not increase to fund proposed developments
- reclamation of old hydro plant site

We generally support the idea of expanding infrastructure as needed to sustainably absorb anticipated use for the purpose of reducing impacts, but do not support added infrastructure that would detract from the natural spectacle, or the requirement that visitors use skill and good judgment to walk, climb, and paddle through the terrain. We do not believe that creating a city park atmosphere is in the spirit of the Wild and Scenic Rivers Act. Certain improvements, such as installation of vault toilets, would be valuable, and bike racks would serve to make shuttling between trailheads easier. However, some of the proposals to expand infrastructure are concerning.

“Powerhouse Falls” (aka “Double Drop Falls”) near the Irving parking area is one of the most scenic sites and best whitewater rapids on the entire creek. This area exhibits outstandingly remarkable values that have the potential to be significantly degraded by the construction of a bridge over the creek at the Irving site, expanded parking access, and installation of picnic tables, kiosks, boardwalks, and other infrastructure in the vicinity. Powerhouse Falls is a Class III-IV rapid that is frequently run by kayakers and packrafters, and the area also is popular with swimmers. Therefore, the potential exists for collisions between paddlers and swimmers. Diligent scouting by paddlers and swimmers, and good communication between these groups are critical for accident prevention. These habits are instilled through education and mentorship. Accident potential would be exacerbated by increasing the number of people in the area with increased parking and facilities. Also, people viewing the scene from the bridge would be a distraction for swimmers and paddlers who are focusing on safety, especially if cameras and videos were inciting “Kodak courage.” Parking should be strictly limited at Irving with stiff fines for violations.

Currently, visitors tend to congregate on the east side of the upper falls where there is some shade, quick access to cooling creek water, and mostly durable surfaces. In general, visitors do not use the area around the hydro plant because it has little shade, and it does not provide a good view or access to the falls and pool. If planners would like to attract visitors to the site of the old hydro plant, considerable work would be required to improve this area enough to pull visitors off the east bank. Removal of old concrete foundations, addition of shade trees, planting of dust-reducing low vegetation, and installation of picnic tables and toilets would be an expensive prospect requiring a vehicle bridge for heavy equipment over Fossil Creek. Pulling people from the east-side rocky banks to the old hydro site would necessitate what would be a very unpopular closure of the east side of the creek to revelers.

Suggested Revision to Preferred Alternative

To preserve the wild and scenic feel of Fossil Creek’s coveted pools and waterfalls, we advocate for minimizing vehicular intrusions into the Irving and Lewis (Waterfall) Trailhead areas. Instead, we recommend developing and improving parking at Cactus Flat, Homestead, and Tonto Bench to accommodate the majority of parked vehicles. Rather than developing the undisturbed area around Heinrich for an entrance station, perhaps that development would be better placed near Homestead. Then, we suggest enhancing the visitor experience by improving trail access from remote parking to the Irving area. Preserve the tranquility of the Irving area, and assist paddler and swimmer safety and coexistence efforts by maintaining current parking capacities at Irving and Lewis Trailhead, and rejecting the bridge idea across to the old hydro plant.

If planners feel it is important to develop some new facilities at the old hydro plant site, we do not expect that this area would be used without considerable investment, and without closing the east side to picnicking. In this case, we would advocate for the construction of a pedestrian/horse bridge across Fossil Creek about 320 yards downstream of the falls and pool, along with the development of a trail along the west side of the creek. Reclamation of the hydro site and infrastructure improvements would then be carried out by hand and horse, rather than by heavy machinery, which would be much cheaper and both the process and result would be more in line with Wild and Scenic values. If the east side near

the falls was not closed to picnicking, we would support improving and maintaining the picnic area immediately north of Irving parking lot, but do not support the construction of unnatural overlooks or decks.

We also advise selecting a preferred alternative that develops a boardwalk, increased parking, picnic areas, and other infrastructure at the Tonto Bench area. Tonto Bench includes scenic cliffs and pools similar to the Irving site, and a boardwalk and picnic tables in this area would serve to highlight the outstanding recreational values of the Fossil Creek area for less mobile or disabled visitors. Parking capacity can be increased on the south side of the road at Tonto Bench, at much less expense and intrusion than constructing a bridge at Irving. Moreover, the creek at Tonto Bench is a placid non-whitewater section of creek, which would make increased visitation much less of an issue for accidents and conflicts between user groups compared to increased visitation at Irving.

Beyond specific concerns about Irving, APA also requests more transparency about the capital expenditures required to develop and maintain so many new facilities 20 miles from the nearest paved road. A cost/benefit analysis for this infrastructure development, operation, and maintenance should be undertaken, and proposed sources of development capital should be expressed. There is concern that the proposed infrastructure at Fossil Creek might necessitate increasing permit costs to levels that some of our members might not be able to afford paying.

MINIMIZE OHV ACCESS

We support Alternative C—the Non-Motorized Experience—because the speed, whine, and dust of passing vehicles greatly detracts from values delineated in Fossil Creek’s Wild and Scenic designation. The allowance of off-highway vehicles on area roads poses great problems for pedestrian safety and enjoyment, and could necessitate alternative parallel trail building with associated impacts. However, we understand that the local motorized community is passionate about maintaining the privilege to cross Fossil Creek on FR 708. Firstly, the road already exists, so no new road building would be required. Secondly, impacts on the river corridor would be small if access was limited. Thirdly, there is historical precedent of people enjoying their motorized experience in Fossil Creek. For these reasons, we are willing to compromise, and support limited permitted motorized access along the entire length of FR 708 across Fossil Creek canyon, as well as regular road maintenance as needed for motorist safety and passage for administrative vehicles. If possible, we would suggest somehow segregating the road corridor between Homestead and Lewis Trailhead into motorized and pedestrian lanes.

MAINTAIN FR 502

We support maintaining access and road quality on FR 502 to Childs, as well as controlling erosion and improving parking without increasing parking area sizes at Sally May, Purple Mountain, and Mazatzal.

Comments

FR 502 has served as an important takeout point for paddlers running the whitewater section of the Verde River from Beasley Flat, as well as a put-in location for groups paddling down to Sheep Bridge. FR 502 also acts as an access route for groups paddling Fossil Creek below Mazatzal trailhead to the confluence with the Verde. Although vehicle access is less important for packrafters, who can walk to and from the Verde River, restricted access along this road would be a considerable inconvenience for other boaters. There is little evidence that Fossil Creek below Mazatzal trailhead has any of the overuse issues

that led to the permit requirements for the central section of Fossil Creek. Installing a gate on FR 502 would add administrative burden for forest rangers to monitor and manage, with questionable benefit.

Suggested Revision to Preferred Alternative

Keep FR 502 open to all travel from FR 708 junction to Childs. Improve the road, parking areas, and trailheads without increasing capacity.

IMPROVE HIKING OPPORTUNITIES

As packrafters, we look for opportunities to combine paddling with hiking. We advocate for the development, improvement, and maintenance of trails as necessary to minimize the need for road walking, and to enhance the experience of “human-powered approach” to popular areas along Fossil Creek. Hence, we would not support complete or partial closures of trails from the south rim to Fossil Springs, or on the Flume Trail from the Irving area. We do not support the construction of an overlook at the end of a shortened Flume trail. We support the construction of a trail from Cactus Flat to Irving, with the River Connector and Irving Connector spur trails. We also support limited and permitted camping opportunities at appropriate places along Fossil Creek.

COMMERCIAL GUIDED OUTFITTING AND HIKING

Alternatives B and E propose to extend privileges to outfitters/guides, including designating one camping site, regular user-day allotments, as well as reserved parking at Sally Mae, Purple Mountain, and potentially the Lewis/Waterfall trailhead as well.

Comments

We understand that commercial outfitters would need a guaranteed level of access in order to conduct business in Fossil Creek. However, we are concerned that there is simply too much non-commercial public interest in Fossil Creek to justify blocking out any user-days for commercial uses. Moreover, we question what the purpose, need, and interest might be for commercial outfitting in Fossil Creek. Guides for horseback riding and paddling might be valuable and warranted, but it seems unlikely that visitors would need or want to hire guides for hiking and camping in Fossil Creek. On a positive note, we understand and appreciate that the regular presence of good guides could improve public safety in Fossil Creek, both as a preventative influence for accidents, as well as providing on-site first response. Guides also could provide some education and interpretation about the area’s natural history, human history, and how to behave in such a way that protects resources. However, in our experience, guides must be focused on their clients, and tend to avoid the crowded areas where accident prevention is needed. All considered, we feel that the benefits of allowing commercial outfitting do not outweigh the cost in access to the general public.

Suggested Revision to Preferred Alternative

Remove any allotment for commercial outfitting in Fossil Creek.

APA again thanks the Coconino National Forest for your efforts on behalf of Fossil Creek and the paddling community. We hope you will consider our comments and incorporate them into a redrafted preferred alternative. APA intends to step up our efforts at Fossil Creek to educate packrafters about safety, Leave No Trace principles, and coexistence with other visitors.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brad Meiklejohn', with a long horizontal flourish extending to the right.

Brad Meiklejohn
President, American Packrafting Association

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