



American Packrafting Association

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Superintendent Dave Uberuaga
Grand Canyon National Park
Attn: Backcountry Management Plan
PO Box 129
Grand Canyon, AZ 86023

Dear Superintendent Dave Uberuaga;

Thank you for the opportunity to comment on the Grand Canyon Backcountry Management Plan DEIS. Considering its location between two impounded river reaches, its high use by the public, and its wild character, Grand Canyon National Park may be America's premier managed conservation area, and one of the best at balancing use and preservation.

American Packrafting Association (APA) represents approximately 1,500 packrafters from around the world. Without question, every one of our members regards Grand Canyon National Park (GCNP) as one of the world's finest venues for packrafting. Also, we all applaud the thoughtful efforts of the NPS to protect Canyon resources and preserve the wilderness experience for all.

Small enough to be carried as part any backpacking kit, but river-worthy enough to run every rapid in the Canyon at most water levels, packrafts allow visitors to explore the canyon walls, mesas, and side canyons as Harvey Butchart did, and to run its rapids during the same trip with elegance approaching that of Martin Litton's dories. Packrafters seek many different applications for their chosen craft in Grand Canyon, including:

1. Packrafts as satellite craft allow lottery river trip members the option to run all or some of the Canyon supported by large equipment-carrying rafts.
2. Self-supported packraft parties run the entire Canyon on lottery permits.
3. Backpackers use the lightest and smallest packraft models to cross the river during cross-Canyon itineraries.
4. Canyoneers use a variety of packraft models, depending on their itinerary, for river access and egress to and from side-canyon mouths and access routes.
5. Voyagers use packrafts for "raft-assisted backcountry travel" during "landscape trips," which navigate large tracts of the Canyon following natural features such as breaks, slots, benches, and of course the river. The intrigue of on-route highlights—such as natural bridges, petroglyph panels, outstanding slots, obscure Redwall breaks, and fast established trails—comprises only a portion of a Voyager's attraction to a particular route. Voyagers also gravitate to routes that use river travel to loop around topographic features such as Cape Royal, Powell Plateau, Great Thumb Mesa, or Kelly Point—often with the intent to start and finish a trip at the same trailhead or a short shuttle away.

6. Highly skilled packrafters are undaunted when planning backcountry itineraries that require RABT in some of the Canyon's most challenging stretches of the river.

APA appreciates the monumental challenge of managing the diverse recreational interests in Grand Canyon, while protecting the environment we all cherish. We understand that GCNP has a separate River Management Plan that governs river trips, and that any river travel under the auspices of a backcountry permit may only be undertaken for the purpose of facilitating a backcountry itinerary. We appreciate that GCNP understands the need for "raft-assisted backcountry travel" (RABT) and has selected a preferred DEIS alternative that includes sustainable opportunities for this type of activity in the river corridor.

In advocating for our members, whose diverse interests run the gamut of the above listed pursuits, APA's comments on the DEIS reflect the following general principles:

1. First and foremost for APA is the protection of Canyon resources, such as wildlife, soils, native vegetation, cultural sites, and water quality, as well as the experience of solitude, quiet, and freedom in a wilderness setting. Hence, in general, APA would NOT like to see significant increases in backcountry permitting, designated campsites, and party sizes in any of the management zones. None of the action alternatives appear to contain unreasonable or immodest adjustments in backcountry use. APA defers to the best judgment of experienced backcountry managers to select appropriate levels, party types, and locations, so as to protect resources and the wilderness experience. We trust that the NPS would utilize the Adaptive Management Process should unforeseen problems arise.
2. APA is in favor of appropriately maximizing rim access points, minimizing area closures, and minimizing RABT zone closures to increase the number of options for backcountry itineraries and to disperse visitor impacts. Many of the initiatives in Alternative C satisfy this interest.
3. In our analysis of the proposed RABT zones, our comments aim to encourage and maximize opportunities for the various interests of our members, while protecting Canyon resources and the visitor experience. Alternative C RABT zones best satisfy all packrafter interests, while protecting the wilderness the experience of other river users. Here are the basic needs that Alternative C appropriately meets:
 - a. Backpackers need to cross the river in safe locations and travel for short distances on the river with minimal equipment.
 - b. Canyoneers need to navigate variable distances along the river, in both the upstream and downstream directions, with minimal equipment.
 - c. Voyagers need to cover longer distances on the river to reach reasonable and interesting exit routes for the next overland portion of their journey. Voyagers also may have a need to use the river as a travel corridor a second or third time in a different zone during the same trip. Alt C RABT zones are large enough that it is worth the effort to carry a packraft down to the river. Also, Alt C zones are large enough that camps would not be forced early in the day because parties have reached the end of a zone.
 - d. Alt C provides opportunities for the most skilled and experienced packrafters to select backcountry itineraries that include RABT in some of the Canyon's biggest whitewater sections. Special permitting consideration would increase safety and decrease perceived potential user conflicts.

Specific Comments

1. **RABT Zones:** APA favors **Alternative C** over Alternative B for the following reasons:

- a. The large number of zones in Alternative B mean potentially more administrative headaches, hassles, and bottlenecks...for rangers issuing permits, crowded ranger stations, and backpackers planning trips and seeking RABT permits. Trip planning would be much simpler with Alternative C's longer zones.
- b. Relative to the longer zones of Alternative C, the shorter zones of Alternative B will tend to concentrate camping and other riverbank activity near the end of each zone. The longer zones of Alternative C may reduce the occurrence of take-outs and camping activity at the end of each zone.
- c. Backpackers and canyoneers are very well served by Alternative C. No routes in Martin's *Grand Canyoneering* would be disallowed under this alternative.
- d. Voyagers seek a variety of backpacking and canyoneering routes, and thus are well served by Alt C. The 12 zones of Alt C allow for flexibility, creativity, and freedom in planning and executing RABT trips. The 31 zones of Alt B effectively limit RABT trips to set routes within each zone. Shorter zones do not work as well for Voyager trips because these parties need to cover more mileage for their grander "landscape trips," rather than being forced to camp after only a short distance of river travel because of a zone boundary. Feelings of freedom and exploration are maximized with Alt C.
- e. The 31 zones of Alt B pigeonhole backpacking/canyoneering route options onto the same 1 or 2 routes in each zone, thus increasing resource impacts along those routes. This is especially true in eastern Grand Canyon. The 12 zones of Alt C theoretically spread out the impacts of RABT visitors by allowing more creativity in route planning.
- f. The shorter zones of Alternative B theoretically keep RABT users lingering in the River Zone longer because the zones force early camps and there is less motivation to keep moving. Longer time in each zone under Alt B means more camps, more lingering in places like Redwall Cavern, and more encounters with other users. Longer zones keep RABT users moving through, which makes their presence more ephemeral.

2. **Adjacent RABT Zones and Party Size:** APA supports the authorization under both alternatives B and C for RABT users to venture into one additional adjacent or non-adjacent RABT zone during the same trip, but on a different day. This allowance alleviates the problem of some classic itineraries being disallowed because the entry or exit falls just outside the initial RABT zone. APA supports the 6-person limit on RABT trips.

3. **Day-Use Permits:** APA supports the action alternative additions of day-use permits for RABT. Day-use RABT should be encouraged because it eliminates camping impacts, and reduces encounters with other users. Many exceptional one-day RABT outings are possible in the eastern half of Grand Canyon.

4. **Alternative C RABT Zone Chart Error:** The chart of RABT zones on page 62 apparently has a significant omission. Please note that no management directive has been included for the LCR-Boat Beach stretch. This should be Zone 4. We are making the assumption that this zone is open to RABT in Alt C. Also, please note that all of the subsequent zone numbers are incorrect in that chart. There are 12 zones in Alt C, not 11.

5. Suggested Zone Changes in Upper Granite Gorge: With regard to Alternative B RABT zones 11 (Hance to Grapevine) and 12 (Grapevine to Boat Beach), these zones, as delineated, encompass an area of Granite Gorge that can bottleneck with river trips due to highly desirable exchanges at Phantom Ranch. Rather than forcing a camp near congested Grapevine Canyon because it is a zone boundary, APA suggests combining Alt B zones 11 and 12 into one zone so that RABT users would be able to exit at Boat Beach. An even better solution would be to simply adopt Alternative C with regard to RABT zones. Alt C zones would alleviate the bottleneck problem, and allow for fabulous backcountry routes along the Tonto from South Kaibab or Red Canyon with a RABT return to Phantom.

With regard to the interface at Horn Creek between zones 13 and 14 in Alternative B and zones 6 and 7 in Alternative C, APA suggests changing the zone boundary in both alternatives to the tail waves of Pipe Creek Rapid for the following reasons:

- a. We feel that the Horn Creek zone boundary forces unnecessarily difficult river access. Firstly, access down Horn Creek has two rappels and several difficult downclimbs. The first rappel is 130 feet. While some RABT users will need 300+ feet of rope for other canyoneering objectives on that same itinerary, others may be embarking on non-technical itineraries and would prefer to travel light. Secondly, launching a packraft in the tail waves of Horn Creek Rapid is a risky venture, especially for RABT users launching small Supai (or similar) packrafts.
- b. While the difficulty of the Horn Creek descent and packraft launch creates a natural and desirable obstacle to dissuade the less experienced RABT user from entering one of the Canyon's most turbid stretches, we feel a similar effect of discouraging the inexperienced could be achieved by requiring RABT users to scramble around the corner downstream of Pipe Creek outlet for a quarter mile or so. If the zone boundary was below Pipe Creek Rapid's second set of waves, this extra hike is an adequate deterrent to keep the inexperienced from launching, especially if they are aware of what is coming just downstream. Unwary and unpermitted packrafters are going to launch at Pipe Creek Beach regardless of RABT zones because they do not know any better. It is pointless to complicate the trip of every legitimate RABT user with a Horn Creek launch merely to protect the very rare unwary group or individual that would inadvertently launch at Pipe Creek Beach.
- c. With a zone boundary below Pipe Creek Rapid, RABT users wishing to portage Horn Creek Rapid would be able to do so on river right.
- d. With a zone boundary below Pipe Creek Rapid, RABT users who are interested in a canyoneering descent of Trinity Creek would be able to more safely and easily access 91-Mile Canyon for the approach.
- e. With a zone boundary below Pipe Creek Rapid, RABT users considering a packraft run of Horn Creek Rapid would be able to scout the rapid on river right.
- f. With a zone boundary below Pipe Creek Rapid, RABT users could run the zone above Boat Beach, spend the night at Phantom or Bright Angel Campground, and then run the zone below Pipe Creek Rapid the next day. This would make classic RABT loops from Tanner Trail to Boucher possible under Alt C, or Red Canyon to Monument Creek possible under Alt B (if the Hance-Grapevine-Boat Beach zones were combined).

6. Boat Beach to Pipe Creek Rapid Tailwaves Zone: APA supports the existence of a RABT-free zone between Boat Beach and Pipe Creek Rapid tailwaves (Zone 12 in Alternative B, assuming Hance to Boat Beach morphs into one zone) (Zone 5 in Alternative C) for the following reasons:

- a. It is APA's intention that packrafters and RABT users will be as inconspicuous in the Canyon as possible. We feel that RABT users arriving at Boat Beach is much less conspicuous than RABT users launching at Boat Beach.
- b. APA understands and appreciates NPS concerns about ease of access to the enticing Granite Gorge below Phantom, and the risk of permitting unprepared and inexperienced packrafters in some of the Canyon's most challenging whitewater. A RABT closure below Boat Beach is smart from a safety perspective.
- c. APA appreciates that both alternatives B and C present opportunities for RABT travel in Upper Granite Gorge (Hance to Boat Beach, and below Horn Creek).

7. Tapeats to Fishtail: With regard to the proposed RABT closure in all the alternatives for the Tapeats to Fishtail stretch, the DEIS stated reason for this closure is "Adequate hiking access; RABT not needed to facilitate backcountry itinerary" (pages 58 and 62). On the contrary, backpackers wishing to make a loop down Tapeats Creek and up Deer Creek would be unable to make this classic loop without packrafts because of inadequate hiking access along the Granite Narrows. So indeed, RABT is required to facilitate a Tapeats-Deer backcountry itinerary. If the RABT zone is closed to cap visitor use in this already heavily-used area, then the closure rationale should express it as such. If capping use is the intended rationale, perhaps this closure could be a temporal one coinciding with periods of high use by river parties in Tapeats and Deer creeks. Then, during slower periods, this classic hike and RABT loop could be experienced by backcountry permit holders without impacts to other users. Also, if this zone was open temporally, a complete RABT loop could be made around Great Thumb Mesa during some times of the year. This use would coincide with the gradual opening of Great Thumb through Havasupai lands.

8. Suggested Alt B Zone Changes in Western Grand Canyon: Alternative B RABT zones 27 to 31 need to be realigned so that RABT trips around Kelly Point can be made. The longest ideal trip would be from Parashant to Surprise, but allowing Spring, 209-mile, or Trail to Separation would be appreciated (Alt C allows all of them). Also, current zones end with exits onto Hualapai lands, which effectively shortens or nullifies the zones because the Hualapai consistently refuse to issue permits for backcountry travel on their lands. APA suggests revising Alt B zones 27-31 (deleting zones 30 and 31) to allow North Rim (NPS) entries and exits as follows:

- Zone 27: Trail Canyon to Separation Canyon
- Zone 28: Separation Canyon to Burnt Canyon
- Zone 29: Burnt Canyon to Pearce Ferry

9. RABT Camping in River Zone: With regard to RABT camps in the River Zone, APA feels strongly that, in no alternative or circumstances, should RABT users be allowed to use major river camps. This is a recipe for strained relations between user groups. If you check the RABT box, then there is no camping allowed in the major river camps. RABT users can easily camp at any number of small beaches and ledge camps anywhere along the River Zone. APA intends to educate packrafters to avoid interfering with the experience of traditional river runners. The EIS should specifically identify camps that are off limits to RABT users to avoid gray areas, unnecessary conflicts, and to protect the experience of solitude on the riverbank.

10. Adaptive Management Process: APA feels that the public should be involved in the Adaptive Management Process. Stakeholder groups often have deep knowledge of the resource, are a source of ideas, and may provide manpower and funding to solve difficult problems when they arise. A press release should be put out asking for public comment when Adaptive Management is invoked. The

public should have 30 days to provide ideas into the “design” element of the Adaptive Management process on page 46 of the DEIS.

11. Adaptive Management and RABT: The DEIS mentions many times that there is little or no data or knowledge about the impacts of RABT travel at this time. For this reason, APA feels it is important that the NPS use the Adaptive Management Process to adjust RABT use levels and zones as needed to ensure that resources are protected and varied visitor interests are accommodated where appropriate.

12. Additional Threshold Zone Use Areas and Additional Corridor Zone campsites: With regard to increasing group sizes, adding designated campsites, and potentially allowing more commercial activity (pending a commercial use analysis), APA supports the spirit of Alt D, which allows for “self-exploration and wilderness solitude” by limiting commercial activity and group sizes in the wilderness. Opportunities for non-guided hiking should not be reduced by increased commercial hiking.

13. Deer Creek Narrows: APA acknowledges the sensitivity of this area and would not like to see it overrun with unlimited canyoneering use as seems possible in Alternative C. We would look to the NPS to establish a management system that allows some use, but also respects the area’s cultural heritage and protects other ORVs of the area. Special permits should be required for any and every canyoneering outing in Deer Creek Narrows, whether desired by river runners or backpacking permit holders. The NPS should coordinate with the Kaibab Paiute and other stakeholders to determine times of year, month, or days of the week that the Deer Creek Narrows are open/closed to canyoneering activity.

14. Great Thumb Mesa and Tenderfoot Rim: APA’s interest in varied rim access stems from a desire to maximize appropriate opportunities to concoct new and interesting ways to explore the Grand Canyon on foot and by packraft. APA appreciates that the NPS is working with the Havasupai on a pilot program to issue 10 springtime permits for small groups to cross tribal lands for rim access. We hope this program will establish a respectful working relationship between the tribe, the NPS, and Park visitors and lead to year-round permitted access through tribal lands to the degree authorized by Park regulations in zones BS9, BT9, and BU9.

15. Boundary Road: Whether to open and maintain Boundary Road as proposed in Alternative C for vehicle access to Pasture Wash is a difficult decision. While APA would like to see minimal additional disturbance and road building on the rim, there are other issues at play. The Boundary Road may be more reliable in wet conditions than lower Pasture Wash. The potential of being required to pay an expensive tribal entry fee to cross less than 4 miles of Havasupai land on the alternate route (328) to reach South Bass trailhead is an unnecessary complication and discouragement for some Park visitors. The value of this entry fee value would someday hopefully increase as permitted access increased on Great Thumb Mesa. From these perspectives, an open Boundary Road would, for now, simplify and protect access to the popular South Bass trailhead. APA supports whatever solution the NPS selects.

16. RABT Trip Test in Alternatives B and C: The following table lists whether or not some of the most common and desired RABT trips would be permitted under Alternatives B and C. Pertinent zone numbers are included.

Trip	Alternative B	Alternative C
Rider to South	Yes - 5	Yes - 2
Soap to Rider; Rider to South	Yes - 5,6	Yes - 2
Rider to South; South to Eminence	Yes - 5,6	Yes - 2,3
Shinumo Wash to Eminence	Yes - 5,6	Yes - 2,3
Tatahatso, around Tatahatso Point, up Eminence	Yes - 6	Yes - 3
South to Nankoweap	Yes - 6,7	Yes - 3
Nankoweap, around Cape Royal, up Bright Angel Canyon	No	Yes - 4,5
Nankoweap, Vishnu Temple, up Angels Window	No	Yes - 4
down Little Colorado, up Tanner Trail	Yes - 9	Yes - 4
Angels Window, Tabernacle, Bright Angel Trail	No	Yes - 4
Angels Window, Vishnu Creek, Bright Angel Trail	Yes - 11,12	Yes - 4
Hance/Grapevine/Boulder to Phantom, South Kaibab	Yes - 11,12	Yes - 4
Pipe Creek to Hermit	No	No
Horn Creek to Hermit	No	Yes - 6
Hermit to Bass	No	Yes - 6
Boucher to Bass, Tonto Trail to South Rim	Yes - 16	Yes - 6
Muav/Shinumo, around Powell Plateau, Galloway/Tapeats	Yes - 17	Yes - 7
Boucher to Tapeats to Phantom to South Rim	Yes - 17,18	Yes - 6,7
South Bass, Shinumo, Royal Arch Route	Yes - 17	Yes - 7
Apache Point, around Great Thumb, Havasu (see comment #7)	No	No
Enfilade Point, around Great Thumb, Matkat (see comment #7)	No	No
Cave Route, around Great Thumb, Keyhole/Olo (see comment #7)	No	No
140-mile to Havasu	Yes - 19,20	Yes - 9
Kanab to 150-mile	Yes - 20	Yes - 9
150-mile, up Matkat, down Olo, up 150-mile	Yes - 20	Yes - 9
Kanab to Tuckup	Yes - 20,21	Yes - 9,10
150-mile to Lava up to Toroweap	No	Yes - 9,10
Havasu to Lava	Yes - 21,22	Yes - 10
Tuckup, up National, Pocket Point, up Tuckup	Yes - 21,22	Yes - 10
down Parashant, around Kelly Point, up Surprise	No	Yes - 11,12
Trail Canyon, around Kelly Point, up Separation (see comment #8)	No	Yes - 11,12
Surprise Canyon, around Twin Point, up Burnt Canyon	Yes - 30	Yes - 12
Total Yesses	20	27

In conclusion, thank you for the opportunity to comment on the Grand Canyon Backcountry Management Plan DEIS. With regard to RABT zones, Alternative C is the best choice for protecting resources and everyone's visitor experience. We hope the NPS will adopt this zone configuration in the final preferred alternative and blend conservative and respectful elements of Alternative B and D with regard to increasing backcountry use and dealings with the various tribes. We look forward to the final BMP and working together with Park staff during its implementation.

Thank you,



Brad Meiklejohn, APA President, and the APA Board of Directors