

American Packrafting Association

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

January 23, 2017

Superintendent Jeff Mow Glacier National Park PO Box 128 West Glacier, MT 59936

Dear Superintendent Jeff Mow,

We are writing today on behalf of our 1,300 members to comment on the interim boating closure within Glacier National Park. 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.

Paddlers of small craft, such as packrafts, have enjoyed managed access to the majestic rivers and lakes of Glacier National Park. We would like to see that access continue, but not at the expense of the pristine waters that we all enjoy in the Park. For this reason, we appreciate your diligence in putting a hold on activities that may pose a risk for the spread of aquatic invasive species until a full assessment of the problem is complete and appropriate actions undertaken.

As you may know, the State offices of Fish and Game in Montana, Idaho, and Wyoming consider hand-propelled vessels under 10 feet in length to pose a considerably lower risk for AIS transmission than larger motorized craft. Packrafts and small kayaks, in particular, are easily rinsed and dried after each use, which preserves equipment life while eliminating AIS. Still, we appreciate that the National Park Service often reaches for higher standards in environmental protection than host states and we understand that an aggressive approach may be the most effective method in this case for protecting the pristine waters of Glacier National Park. This extra diligence is especially important in Glacier National Park, where management of the north and middle forks of the Flathead River, both very popular with anglers and paddlers, is shared with the U.S. Forest Service.

In your November 10, 2016 press release, "Interim Closure Issued for all Boating within Glacier National Park," a comparable ban on streambed wading was not mentioned, which was surprising given the otherwise aggressive approach of banning small paddle craft. According to Wyoming certified AIS inspector Aaron Pruzan, "Waders, footwear, kayaks, packrafts, and canoes are all of a similar risk level. Powerboats or anything with a bilge are a much more severe risk." Unfortunate lessons in Yellowstone have taught us that certain aquatic invasive species, such as New Zealand mud snails, were most likely spread by streambed wading, since paddling is not allowed there. Many paddlers also are anglers, so this is not about one user group versus another. Our concern is that Glacier National Park acts fairly and in the most diligent way possible to stop the AIS outbreak, by addressing all potential AIS vectors.

We hope the current AIS outbreak may be brought under control quickly, and therefore we would support an aggressive approach that temporarily bans all potential vectors, including small paddle craft and streambed wading. If GNP decides this winter that the aggressive approach is not warranted, then APA requests that small paddle craft be excluded from the boating ban, along with streambed wading. Most importantly, it is quite clear that the greatest risk is from powerboats. If they are to ever be allowed on Park waterways in the future, regulations should mandate high-temperature decontamination and quarantine prior to launching in the Park.

As for packrafting, American Packrafting Association is ready to step up our efforts this year on behalf of Glacier National Park, and all of America's watercourses, to educate our members about the perils of aquatic invasive species, and practices for preventing transmission. We look forward to learning about GNP's prevention and suppression strategies in the coming months and intend to support the Park however we can. When the epidemic is contained, we look forward to once again paddling and fishing the streams of Glacier National Park.

Sincerely,

Brad Meikleiohn

President, American Packrafting Association

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