



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

American Packrafting Association

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March 23, 2019

Coconino National Forest
Attn: Fossil Creek CRMP
P.O. Box 20429
Sedona, AZ 86341

Dear Sir or Madam,

In brief:

The American Packrafting Association asks the USFS to curtail development at Irving, and redirect this and other high impact activities to a different location.

Background and details:

Thank you for the opportunity to comment on the Fossil Creek CRMP. Fossil Creek is an important resource to paddlers, and the only boat-navigable travertine waterway in the US. Similar streams exist in Chiapas, Mexico, but for US-based paddlers, Fossil Creek is the only option. Additionally, Fossil Creek is the only major whitewater in Arizona that is both accessible and navigable year-round. Other Arizona rivers like the Salt or Verde are dependent on snowmelt or major storms to provide enough flow for paddling. The Colorado River in the Grand Canyon flows year-round, but access is controlled by a complex, high-demand permit system. Fossil Creek therefore represents a critical recreation resource for whitewater boaters. Hikers, swimmers, and off-road users in Arizona have thousands of options; paddlers do not.

The American Packrafting Association is a US-based organization with over 1,200 members worldwide. Founded in 2012, APA works to conserve the wild places that are the heartland of packrafting and promote safe, responsible packrafting across America, and worldwide. Packrafts are the top boat of choice for paddling Fossil Creek, for several reasons. Their light weight makes them perfect for hiking in to Fossil Springs or Fossil Creek Waterfall. Packrafts have the shallowest draft of any creek boat, much more so than any hard-shell kayak, making them ideal for Fossil's shallow flow. Additionally, packrafts are short in length and highly maneuverable, which is ideal for navigating the vegetation along the creek. Local expert and author of Paddling Arizona Tyler Williams recommends an inflatable boat less than 7 feet in length for Fossil Creek, which rules out many typical inflatable kayakers. Packrafters make up a high proportion of Fossil Creek boaters, compared to hard shell and inflatable kayakers.

On behalf of the packrafting community, the **APA is especially concerned about plans in the USFS preferred alternative to build out infrastructure at the Irving location, and use Irving as a focal point for visitor and administrative facilities.** During the original scoping in 2016/2017, APA

submitted commentary registering concern with the concept of installing a bridge over the creek at the Irving site aimed at expanding parking access, and installing picnic tables, kiosks, a boardwalk, and other infrastructure. Despite this, current plans to build out visitor facilities at Irving appear to have increased in scope between the initial scoping and the development of the draft CRMP.

The proposed alternatives, including the USFS preferred alternative, have not addressed some of the concerns raised by paddlers during the initial scoping process, and appear to expand the scope of proposed infrastructure development at Irving. Not only are visitor facilities like picnic tables being proposed, but also administration as well as camping facilities, facilitated by the construction of a bridge over the creek at Irving. To quote the documents published by the USFS:

"...in alternatives D and E, at Irving, within the boundaries of the recreation sites. These amenities could consist of a central meeting location with dining, meeting, administrative, and display space; restrooms; and overnight facilities with showers and lodging such as trailer hookups, platform tents, yurts, or small cabins. The Irving site may be expanded with various amenities in alternatives D-F, and a new bridge and additional parking in alternatives D and E. In these alternatives, Irving would serve as a focus for recreation activities in the corridor, taking advantage of a large, previously-disturbed area on the west side of the creek."

It is difficult to overstate the concern that these plans raise among the paddling community. At the risk of belaboring the point, allow us to paint a picture of why infrastructure development at Irving is so problematic.

The bulk of Fossil Creek is Class II to Class III boating. The creek is low volume and has limited pin potential, so the risk of injury is low. That all changes at Irving. **At the Irving site, Fossil Creek flows over a 20-foot waterfall, split into two channels. This waterfall is a significant obstacle to paddlers.** The left channel, where the bulk of the flow goes, is dangerously narrow and features a ledge where the water "jumps" before plunging into the pool below. The right channel has lower flow, but is a more straightforward and safe drop into the pool below. Both channels have been run, but the right channel is safer. The flow pulls left, however. The complexity involved in lining up boats to the right channel and hitting that channel with enough momentum to not get "sucked" left is significant, and raises the whitewater rating on this rapid to Class IV. It is by far the most challenging rapid on the entire creek, and represents outstanding recreational value for whitewater users of Fossil Creek.

If this site were disturbed - by building a bridge over it, for example - it would significantly compromise the recreation value of the creek to boaters. The other rapids on the creek are not a complete substitute in recreational value to Powerhouse Falls. If the falls are compromised, the loss would be deeply felt. The falls are also the narrowest part of the creek at Irving, and it seems likely they would be the first target for building a bridge. **It does not seem possible to put a bridge in at Irving without compromising the scenic and recreational value of the falls.**

Because Powerhouse Falls is right next to the Irving parking site, it's also a significant recreation spot for non-boaters. It's one of the few spots on the creek where you can park your car and, without too much trouble, walk to a waterfall with picnic supplies. On summer weekends, there is almost always a large group of picnickers here. Swimmers and cliff jumpers congregate along the creek and in the pool below the falls. The ORV access important to these users would also be compromised if the site was turned into an administration facility.

More importantly, it's not clear that the Irving site can safely handle the expansion of visitor numbers. Because of the complexity of the whitewater rapid, and the presence of swimmers and cliff jumpers, boaters typically stop above Powerhouse Falls. We walk down to scout the falls, put safety

boaters in place with throw ropes, and ask the revelers to clear out the bottom of the falls temporarily, to prevent injury when boaters go over. If the number of visitors concentrated at Powerhouse Falls goes up, which is surely will if the area is turned into a more developed facility with expanded parking, boater and swimmer conflicts are sure to increase, along with the potential for serious injury. According to USFS data (page 13 of the EIS), most of the injuries and deaths that require Search and Rescue intervention at Fossil Creek take place at the Fossil Springs area and the Fossil Creek Waterfall area. The Irving site/Powerhouse Falls is not on that list, which implies that the amount of people visiting the site currently limits the potential for safety incidents. **If the number of visitors concentrated at Irving were to increase, the potential for boater/swimmer conflicts, injuries and SAR incidents seems likely to increase also.**

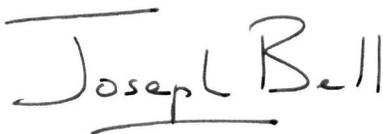
Besides specific concerns about safety and degradation of ORVs, the proposed development at Irving raises some concerns about the overall intent of the CRMP. While we can support some development to enhance recreation opportunities at Fossil Creek, development should be consistent with the nature of the area. Fossil Creek is 14 miles of rough dirt road away from a major highway. The current recreational experience at Fossil Creek is primitive, and the proposal for front country-style visitor facilities like yurts, cabins and trailer hookups seems drastically out of place. We question whether RVs or trucks pulling trailers would even be willing to drive the road in its current form. Surely there are more easily accessible areas in the Coconino National Forest where such development would not only be welcome, but sorely needed. Modest permit fees make Fossil Creek very accessible to the public at present, and we are also concerned that the costs of the proposed development might necessitate an increase in fees.

Rather than developing Irving as a focal spot for visitation at Fossil Creek, a viable alternative appears to exist: The USFS could develop visitor and administration facilities at Cactus Flat. This site is already proposed for infrastructure development in the CRMP, making it apparently acceptable to the USFS as an alternative. It sits near the junction between FR 708 and FR 502, so unlike Irving, the location would enable the Forest Service to use the facilities to not only administer the Fossil Creek area, but also administer and provide interpretation for visitors destined for Childs and the Verde Hot Springs. Development at Cactus Flat would also not require the expensive and ORV-impairing construction of a bridge to access the facilities. Camping facilities could also be developed at Cactus Flat and Heinrich (although we propose that they be kept consistent with the primitive visitor experience those sites currently offer, e.g. tent pads and picnic tables, rather than cabins, yurts and trailer hookups).

In summary, we ask that parking at Irving be kept consistent with current levels, and the disturbed site on the north side of the creek at Irving be reclaimed rather than viewed as a target for development. High impact activities should be redirected to another location such as Cactus Flat.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Joseph L. Bell". The signature is written in a cursive style with a horizontal line underlining the name.

Joseph Bell
President, American Packrafting Association

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