TO: Subcommittee on Public Lands and Environmental Regulation

RE: River Paddling Protection Act (H.R. 3492)

November 19, 2013

Dear Congressmen Cynthia Lummis, Chairman Rob Bishop, and honorable subcommittee members:

On behalf of our 550 members, we would like to thank you for your interest in protecting the rights of paddlers on public lands and introducing the River Paddling Protection Act. The American Packrafting Association (APA) was founded in 2012 to represent the packrafting community on issues of conservation, education, safety, and access. Packrafts are backpackable one-man inflatable boats often used for river travel in the course of a backpacking trip, allowing creative trip itineraries that combine hiking and floating across a landscape.

We hope H.R. 3492 will grant packrafters and other paddlers an opportunity to experience the amazing rivers of the National Elk Refuge (NER), and Yellowstone (YNP) and Grand Teton (GTNP) national parks while preserving the natural wonders that make those places so desirable. Our primary intention in the nine points below is to help convince subcommittee members of the validity and importance of this measure, while expressing some concerns that we hope will be addressed in the bill’s drafting.

1. **Paddlers Are Stewards:** The American paddling community has proven itself as river stewards through individual efforts and organizations such as American Whitewater, American Canoe Association, and American Packrafting Association by working for decades on river conservation and responsible paddling nationwide. Paddlers continued this tradition by collaborating with Federal officials to designate the headwaters of the Snake River as *Wild and Scenic* in 2009. We look to H.R. 3492 to provide a new platform for paddlers and land managers to partner in stewardship of YNP, GTNP, and NER.

2. **Legislating Wilderness?** As devoted members of the conservation community, paddlers have tried for 25
years to engage in a collaborative process with YNP and GTNP. Campaigns, meetings, thousands of comment letters to the individual Parks, to NPS regional and national offices, and to stakeholders throughout the Greater Yellowstone region have all been met with cold rejection of paddling in the Parks. Legislation is indeed a necessary next step toward resolution.

3. **Environment First:** Our primary concern at APA is protecting wildlife, lands, and ecosystems. We also believe that there is room for paddlers alongside other approved uses of the river corridors without appreciable additional impacts to those resources. H.R. 3492 must ensure that land managers continue to have recourse in the protection of wildlife, lands, and ecosystems.

4. **Opportunity to Connect to Nature:** YNP, GTNP, and NER have numerous world-class paddling rivers that would provide an intimate and exhilarating low-impact wilderness experience for all levels of ability. Few would argue that these Parks would rank among the world’s best paddling venues. Also, packrafts are a critical tool for safe river crossings during spring runoff, but this use is prohibited. Passage of H.R. 3492 would end a longstanding impediment to safe river crossings and a very low-impact form recreation on our public lands.

5. **NPS Precedence:** Several National Parks, such as Denali, Grand Canyon, and Canyonlands, have embraced packrafting in particular as a management tool for Park administrators and a recreation tool for visitors. Other Parks, including Dinosaur and Glacier, are currently working to implement recreational packrafting management plans. We look to H.R. 3492 to empower YNP, GTNP, and NER with tools to do the same.

6. **A Little History:** YNP banned paddling in the 1950s to protect fisheries, but never looked at ways that the fisheries could be protected without an outright ban on paddling. Moreover, they did not consider at that time that many river paddlers would want to float the rivers without fishing. Even in a 1988 report, paddling was excluded from the slate of sanctioned Park activities in river corridors with no scientific justification. We hope that H.R. 3492 empowers YNP and GTNP staff to analyze and implement paddling regulations that provide recreational opportunities while protecting these treasured environments.

7. **Wild and Scenic Law:** Following the Snake River Headwaters Legacy Act of 2009, YNP, GTNP, and NER were required by Wild and Scenic law to include an analysis of paddling in a river management plan, but neglected to comply, erroneously concluding that Secretarial CFRs override Wild and Scenic law. We hope H.R. 3492 will clarify that Wild and Scenic law actually takes precedence in this case.

8. **Paddling on NER:** We agree that paddling has a place in the National Elk Refuge, fairly evaluated and managed alongside other human-powered forms of recreation. However, members of APA treasure our National Wildlife Refuge System and want to be sure that any legislation that intends to give paddling equal ground in the NER does not unintentionally change the management of the entire refuge system. As it is worded, we are unsure if this legislation could have broader, unintended effects.
9. **Paddling Is Cheap and Easy:** Depending on how paddling is managed, little or no additional infrastructure or capital expense would be needed to accommodate paddlers. H.R. 3492 is not about big rafting expeditions with large boats and groups of people. River paddlers are small parties seeking hike-in access from existing trailheads and under existing backcountry permit systems. No new boat ramps, restroom facilities, or additional construction will be necessary or requested to integrate paddlers into the list of sanctioned Park activities.

In conclusion, we believe Congressmen Lummis and Bishop have drafted a very simple and clean legislation that frees Yellowstone, Grand Teton, and the National Elk Refuge to engage in required analyses and manage recreational paddling in a way that protects the environment and the visitor experience.

Thank you,

Brad Meiklejohn  
President, American Packrafting Association

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