



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

American Packrafting Association

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Grand Teton National Park
Attn: David Vela
PO Drawer 170
Moose, WY 83012-0170

March 5, 2014

Dear David Vela,

On behalf of the Board, Executive Council, and 570 members of American Packrafting Association, I would like to congratulate you on your new position as Superintendent of Grand Teton National Park! We are excited to welcome you to the Tetons.

American Packrafting Association was founded in 2012 to provide a united voice for the growing sport of packrafting. Packrafts are small inflatable rafts that weigh less than 10 pounds with paddle and the whole kit. Deflated, they roll up to the size of a sleeping bag for easy carriage in a backpack or travel bag. Inflated, packrafts are suitable for both the most technical whitewater and the mellowest family trips.

Essentially, packrafts are the modern evolution of our primitive urge to utilize waterways for transport. Small portable watercraft have been an essential tool since prehistoric man first crossed rivers and traveled downstream. The modern packraft allows for fabulous "landscape trips" that combine backpacking and mountaineering with downriver paddling. The result is an activity that brings immense personal satisfaction and a deep connection with the natural world, with resource impacts that are no greater than backpacking or angling.

As a mix of backpacking and river running, packrafting presents unique challenges for land managers, conservation groups, and other recreationists. It is our mission to help people understand packrafting, address concerns about impacts, educate packrafters on safety and Leave No Trace, and work with public land managers to create packrafting opportunities where appropriate.

We appreciate your stated interest in providing increased opportunities for Park visitors to enjoy a connection with the wild landscape of Grand Teton National Park. We look forward to working with you and GTNP to provide appropriate opportunities for packrafters and other small-craft paddlers in the near future.

We would enjoy the opportunity to meet with you to discuss packrafting in GTNP after you assume your position as Superintendent. We also would be happy to show you, your family, and staff to the banks of a Park stream to discuss packrafting, or even out on a mellow packraft float in the adjacent National Forest or Snake River, so you can see what packrafting is all about. We call it our "Butts in Boats" program...an effort to get land and river managers to experience packrafts firsthand. We hope you will join us.

Sincerely;

Brad Meiklejohn
President, American Packrafting Association



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June 13, 2014

Superintendent David Vela
Grand Teton National Park
PO Drawer 170
Moose, WY 83012

Dear Superintendent David Vela;

Thank you very much for taking the time to meet with members of the Jackson Hole paddling community on May 30, 2014. Our small cadre of passionate paddlers represented paddling organizations and paddlers nationwide. We appreciate your willingness to hear our concerns and interests with regard to paddling rivers and streams in GTNP.

Although we intend to continue supporting a legislative solution, we are happy to hear that GTNP is interested in growing a dialogue on the issue. Our hope is that GTNP will see a way for an administrative solution, so that we may ask our delegation to strike the portion of the River Paddling Protection Act that pertains to GTNP.

We would like to begin by summarizing some of the points from the meeting and provide some written responses and arguments. On each item, we are interested to know if we accurately understood your position, and to hear your reactions to our feedback. Also, please let us know if you have additional concerns that we failed to mention here.

1. Superintendent David Vela was very clear that he intends to listen and value all perspectives with regard to paddling, and uphold his charge to protect Park resources.

Paddlers would not advocate for anything less. Any future paddling activity in Grand Teton Park must be managed so that Park resources are protected. As such, it is not clear to us how paddling would appreciably impact the Park's natural resources. When paddling is compared to other permitted uses of the river corridors, the impacts of paddling appear to pale in comparison to uses such as horsepack trips and angling.

2. With regard to impacts, GTNP noted on a couple of occasions during the meeting that casual trails are a big concern in GTNP.

Clearly, anglers, hikers, and horseback riders are responsible for the existence of casual trails. Paddlers hike established trails to reach gravel bars for put-ins, and would not contribute appreciably to the creation or propagation of casual trails.

3. GTNP was sympathetic to our frustration about ‘process’ during the CRMP scoping and analysis.

The Jackson Hole paddling and river advocacy community was largely responsible for the Snake River Headwaters Legacy Act. A more thorough analysis of paddling was expected.

4. GTNP affirmed that paddling was considered in the CRMP and that valid arguments justified the dismissal of a detailed analysis.

Paddlers disagree with this assertion and provided both ethical and legal arguments to support our position in June 2013 comment letters on the CRMP from APA and AW (copies were provided at the meeting). There has been no showing of diligence from the NPS with consideration of these comments, only a FONSI on the draft CRMP.

5. GTNP stated that it must balance its dual mission to protect resources and provide opportunities for visitor enjoyment. GTNP had two main points showing that current policies satisfy this dual mission. The first point was the statistic that GTNP has 60,000 visitors that enjoy the Park’s waterways each year. The second point was that the section of river from the YNP southern boundary to Jackson Lake adequately serves those GTNP visitors who seek wilderness paddling experiences, and that the Park is not obligated to provide anymore similar opportunities.

Would you please send us a breakdown of the uses that comprise the 60,000 statistic? That is a big round number; it must have component parts. For example, the main GTNP waterway uses appear to be: Jenny Lake shuttle boaters, motor boaters on Jackson Lake, commercial rafters on the Snake River, lake paddlers, and river paddlers. We are interested to see the actual breakdown; including what percentage of the 60,000 are small-craft river paddlers. It is important to recognize that some paddlers who come to GTNP seek low-stress wilderness experiences and hiking access for packrafting on remote streams. Packrafting in particular is a rapidly growing activity worldwide. The Parks have not considered how packrafting can contribute to a wilderness experience and how packrafting can help disperse the already light resource impacts from Park visitors who paddle.

The stretch of the Snake River from YNP to Jackson Lake surely is a beautiful stretch, but it is only one stretch in a Park with many similar and even superior wilderness-paddling opportunities (Please see river inventory, in which we designated this stretch as a “Family River.” We will email this file separately.). That stretch is a less-than-ideal alternative for certain paddlers during certain times of the year, because of inadequate current, strong head winds, considerable flat water, restrictive take-out access, and development and traffic near the put-ins. As in so many things, there is value in having a diversity of recreational water resource opportunities, including properly managed packrafting in select parts of the wild country of GTNP. This would be a mission-appropriate, nationally significant contribution from GTNP to our country.

6. GTNP stated that many Park visitors seek solitude and implied that paddlers would impact that solitude.

Firstly, paddlers are an ephemeral intrusion. They float quietly and gracefully past, and then they are gone. Before and after their passing, the reveler on the riverbank would have complete solitude. Secondly, paddlers are many of the very same Park visitors who seek solitude, and GTNP offers few such opportunities. Paddling is a traditional way for public lands visitors to experience solitude and a connection with nature with little or no impact. GTNP planners would not be reinventing the wheel in devising a paddling management plan that balances solitude interests in river corridors. For example, many river management units limit the number of boat launches per day. Paddlers expect such limits.

7. When we asserted that opening certain Park streams would not result in flotillas of inner tubers, GTNP asked us the question, “How could we prevent that?”

In its analysis of paddling, GTNP would determine where and when inner tubing is appropriate, if at all. Park units with river resources throughout the National Park System regulate the types of watercrafts that are acceptable. There is no reason GTNP could not devise similar plans.

8. GTNP stated that adding paddling opportunities in the Park would increase strain on workload, staffing, and operations.

We understand that GTNP has a full plate with current projects (ie., Moose-Wilson Road, Jenny Lake, casual trails, etc). Paddlers are not asking to be given precedence over these other projects. Paddlers are asking to be added to the queue. There does not have to be greatly increased work involved with implementing a paddling management plan. Much of the operational infrastructure is already in place, such as river rangers, backcountry permits, and boating permits. No new facilities, such as roads, parking lots, boat ramps, or bathrooms, are needed.

9. GTNP stated that funding for an analysis of paddling would be cost prohibitive.

During the analysis for the Snake River Headwaters CRMP, YNP and GTNP spent \$500k on 99 river miles and employed an extensive staff that included planners in both Parks and in the Denver regional NPS office (Regional planners urged the Parks to do a full analysis of paddling.). In contrast, BTNF spent \$300k over a 3-year period with two staffers analyzing over 300 miles of river. Many would argue that the BTNF offered more opportunity for public involvement and created a more equitable and thorough document. We feel that the \$4 million NPS estimate for a paddling analysis is a dramatically exaggerated figure. APA already has produced a thorough navigable river inventory (sent separately by email) that could serve as a starting point for a planning process on paddling. APA and AW will continue to be a willing and available partner in any river or backcountry planning process. And as we discussed, several river and Park advocacy groups certainly could be tapped to help with funding if GTNP showed commitment to the process.

10. GTNP stated that they have heard from other groups who adamantly oppose opening more paddling opportunities in the Park... “David...just leave it alone!”

We have not yet heard an argument against paddling that could not be mitigated through common management practices, nor one that was not based on uninformed assumptions, rhetoric, and NIMBYism. We believe that if we could share a table with opposing groups, a compromise could result that everyone could support. Prior to the introduction of the River Paddling Protection Act, several paddling organizations attempted to have conversations with oppositional groups, but were met with closed ears and minds. APA currently is working on organizing other outreach efforts, including a paddling-conservation summit at the Murie Center. We will keep GTNP updated on these developments.

11. It seemed that GTNP distilled packrafting interest in GTNP streams down to a matter of mere “convenience.”

Using this same logic, one could conclude that Jenny Lake Boating is merely a “convenience” service for those wishing to hike in Cascade Canyon. While boats are not necessary for access to Cascade Canyon, they certainly are convenient, while also providing an outstanding experience on the lake for Park visitors. By the same token, it would be logistically convenient for packrafters if they could continue floating Pacific Creek, Buffalo Fork, or Pilgrim Creek to the Park highway or Snake River. But convenience is incidental. Paddlers’ primary interest is threefold. Firstly, those streams and others like them provide superb opportunities for paddle sports and an intimate connection with the river environment. Secondly, packrafters who create itineraries from BTNF or SNF trailheads value being able to complete their “landscape trip” to a significant topographic landmark—in this case, the Snake River. Thirdly, if paddlers could float to the Park highway or Snake River take-outs, visitors looking for a peaceful driving experience would be spared the additional traffic and dirt-road dust from paddlers shuttling vehicles on access roads to Forest trailheads.

12. There had been some confusion about the location of the GTNP-NER boundary, as there is some inconsistency on regional maps. GTNP confirmed during our meeting that the Gros Ventre River falls entirely outside Grand Teton National Park.

We believe the Gros Ventre River offers superb paddling opportunities because of its easy access and moderate difficulty. The canyon above Kelly is the perfect place to offer a secluded paddling experience to public lands visitors. Shouldn’t anti-paddling enforcement be the responsibility of the National Elk Refuge? We request that the river management plan be amended to more clearly place the Gros Ventre River in the appropriate management and enforcement context under the NER.

13. One item we did not discuss at our May 30, 2014 meeting was the recent search and rescue mission for the missing solo packrafter Scott England (see attached newspaper story).

We were happy to learn that Mr. England was found safe and sound, but regret that considerable rescue resources and personnel were dispatched without emergency. Indeed, like any backcountry user, Mr. England should have provided more concrete plans with friends and family. It is worth noting that Scott England is an Afghanistan-Iraq war veteran who travels extensively throughout the West with his packraft. It would be a fine payback from our nation to our veterans if our National Parks provided some of the restoration our veterans require. Of

course, this already is happening on a limited scale, but we should ramp it up so that wilderness time is an expected, readily available part of re-entry to non-military society; a normal part of the military service bargain. APA pledges to work with GTNP to educate packrafters to reduce emergencies and similar needless rescue efforts.

In closing, we again appreciate your willingness to listen and discuss some of these issues. We strongly feel that regulated paddling is an appropriate use of the more remote streams in GTNP. We are confident that future generations will benefit from our work both today and in recent decades, and someday be permitted to enjoy remote paddling in appropriate places in GTNP. We look forward to working with you and other stakeholders to ensure that all interests are represented and resources protected.

Sincerely,

Len Carlman, citizen paddler

Amy McCarthy, citizen paddler

Forrest McCarthy, board member American Packrafting Association, member American Whitewater

Aaron Pruzan, owner Rendezvous River Sports, Pres. Jackson Hole Kayak Club, member American Whitewater, board emeritus Snake River Fund

Thomas Turiano, VP American Packrafting Association, member American Whitewater, former board Wyoming Wilderness Association

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