



Grand Canyon River Runners Association

*Response to the*

*Colorado River Management Plan  
Draft Environmental Impact Statement*

*January 28, 2005*

preserving public access to the Colorado River



# Grand Canyon River Runners Association

preserving public access to the Colorado River

January 28, 2005

Joseph F. Alston, Superintendent  
Grand Canyon National Park  
Post Office Box 129  
Grand Canyon, Arizona 86023

Dear Superintendent Alston:

Grand Canyon River Runners Association was incorporated in the State of Arizona in September, 2004 in response to a need for a new voice in the Colorado River Management Plan processes. After attending National Park Service sponsored public meetings and stakeholder workshops in 2002 and 2003, incorporators Dwight Sherwood and Mari Carlos felt that the voice of the public was simply not being heard. Grand Canyon River Runners Association was their answer to the dilemma of how best to provide a common and unified voice for the many thousands of Americans and international visitors who have enjoyed, or will enjoy Grand Canyon, their national park and its treasured Colorado River with the services of licensed concessionaires.

The Board of Directors of Grand Canyon River Runners Association (GCRRA) is comprised of seven volunteer individuals with strong ties to Grand Canyon and the Colorado River. Each, in their own way, has seen how Grand Canyon impacts its visitors, and each carries an unshakable commitment to preserve public access so that future generations can experience the magic of a river journey. This commitment is tempered by the knowledge that river visitors bring to the Colorado River a range of physical capabilities, philosophies, expectations, fiscal capacities, time constraints, temperature needs or preferences, equipment limitations, and even medical needs, all of which can be satisfied by the current range of options available through National Park Service licensed concessionaires. We donate twenty percent of all membership dues to the Grand Canyon Conservation Fund in conjunction with our commitment to preserve public access.

Commercial passengers are not new to the Colorado River Management Plan. In past years many have commented on the CRMP, attended public meetings, and in other ways let their opinions be known to the National Park Service. One overriding factor convinced the members of the Board of Directors of GCRRA that these individual efforts were not enough, and that the time had come for the formation of a passenger advocacy group to represent all commercial passengers. The impending release of the CRMP DEIS spurred the directors of GCRRA to act, to participate in and to impact the CRMP process on behalf of the public who relies on licensed concessionaires. Chapter presidents across the United States and abroad have joined in this cause, and, GCRRA now boasts 1800 U.S. and international members since its formation less than five months ago. Significantly, many members have yet to take a river trip.

GCRRA has chosen to participate in the CRMP DEIS process in order to speak for those who have been underrepresented in this process. People with disabilities, family and friends, those who do not own

*Board of Directors*

*Dwight Sherwood - president Pam Whitney - vice president Mari Carlos - secretary/treasurer  
Catharine Cooper Linda Kahan Robert McConnell Ruthann Stoner*

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boats, cannot row or outfit trips, or who, for a huge variety of reasons, do not wish to participate in a self-outfitted trip, are still entitled access to their national park. The commercial launch model currently in play provides a means of access for a wonderfully diverse population, and it is the goal of GCRRA to ensure that this continues.

GCRRA's directors have drawn extensively upon their collective personal experience in the writing of this comment and response to the CRMP DEIS. As oar, motor and dory passengers, as teachers and interpreters, as licensed guides or as NPS river rangers, collectively they have boated in every month and every season of the year. These are the directors of the Grand Canyon River Runners Association:

GCRRA president, Dwight Sherwood, is a multi-trip commercial passenger. He has also acted as an escort for Whitmore interchange passengers, gaining constant reinforcement of the life changing nature of Grand Canyon. He is firmly committed to preserving public access to the Canyon and was a driving force behind the formation and incorporation of Grand Canyon River Runners Association. Dwight attended public meetings in 2002 and 2003 as well as an NPS sponsored stakeholder workshop in Phoenix in June, 2003. He works in real estate in the Phoenix area.

Vice-president Pam Whitney began her affiliation with the Canyon working for one of the original 21 outfitters and has been actively involved with all Grand Canyon management plans starting with the initial CRMP in 1976. She is co-owner of a specialty travel business centered on water-based adventures. Much of the business stems from the worldwide interest in Grand Canyon, and Pam's daily interaction with her customers underscores the need for the full range of trip lengths and types that are currently available. A resident of Flagstaff, Pam has completed over 50 Grand Canyon trips, commercial and private, motor and oar.

Secretary/Treasurer Mari Carlos first rafted Grand Canyon in 1996. Her fervent passion for the Canyon has resulted in seven more oar trips and a staunch commitment to preserve and protect the place that she has come to love. It has long been apparent to her that every commercial passenger leaves as an advocate for Grand Canyon. Public access is therefore not only a right, it is a necessity. Mari participated in the 2003 Phoenix Stakeholder Workshop where she and Dwight Sherwood first discussed the need for a public advocacy group such as Grand Canyon River Runners Association. She lives in Los Angeles and reviews data for the LA County Cancer Surveillance Program.

Dr. Linda Kahan has made 15 river trips through the Grand Canyon beginning in 1970, including 11 dory trips and 4 motorized trips. On her first trip in the Canyon she was deeply impressed by the wealth of fascinating geological phenomena that could be seen in the Canyon. Inspired by what she had learned on her first two trips, in 1973 she organized and led an educational field trip to the Canyon for students from The Evergreen State College in her home state of Washington where she taught biology. Over the last 35 years Linda has continued to bring friends and family to the river. All of Linda's river trips have been as a commercial passenger. More than anything else Linda appreciates the opportunities for gaining knowledge and appreciation for the natural environment which is afforded to canyon visitors by commercial trips, and will remain an advocate for their perpetuation.

Ruthann Stoner has rafted Grand Canyon more than 130 times as a Park Service river ranger until 1986, then continuing as a professional river guide. Guiding both oar and motor trips taught her that the Canyon has an immensely positive and lasting impact on its visitors regardless of the type of craft that conveys them. Most importantly, she believes devoutly that the Canyon must be accessible to people of all abilities. Ruthie's extensive resume includes numerous resource management projects, including research, archeological, wildlife, sociological monitoring, concession management, vegetation rehabilitation and trail maintenance. She has done one private trip in Grand Canyon and was trip leader on at least 12 oar trips. Research trips put her on the water throughout the calendar year on trips ranging

from 6 to 21 days in length. Having been there, she understands the profound difference between a summer trip and a winter trip. Ruthie has been a commercial passenger and private boater on other rivers. A Flagstaff resident, she relishes the opportunity to speak for the outfitted public in the CRMP process. She has taught in the Flagstaff schools and is a commercial artist.

Robert McConnell's introduction to Grand Canyon came when he hiked Havasu Canyon while a freshman at Arizona State University. Subsequently there were numerous other hikes into the Canyon from both rims. Bob's first river trip did not take place until 2001 when it became immediately apparent to him how much more of the Canyon was reserved only for those who approach it from the river. That experience and a subsequent river trip both underscored by the quality of the outfitter and guides, made him an instant advocate for commercial river trips in Grand Canyon. Bob works in Washington, D.C. as the Vice President of Phoenix-based Hawthorne & York International Ltd. He is a former Assistant Attorney General, Office of Legislative and Intergovernmental Affairs, United States Department of Justice.

Catharine Cooper also began her association with Grand Canyon through hiking. This eventually led to commercial river trips and the added magic of seeing side canyons that were previously inaccessible to her. She has participated on paddle, oar and motor trips. She writes a weekly column for a subsidiary of the Los Angeles Times, exhibits her photography, and is an avid adventurer who chooses to spend every spare moment enjoying the outdoors. Catharine joined GCRRA in order to share this spirit and to help preserve the river access opportunities the public currently enjoys.

Grand Canyon River Runners Association is proud to have participated in signing the joint recommendations submitted together with the Grand Canyon River Outfitters Association, the Grand Canyon Private Boaters Association, and American Whitewater. Over and beyond the joint recommendations we submit the following comment and response to the CRMP DEIS. GCRRA thanks Superintendent Alston and the CRMP team for considering this comment. We not only represent our growing membership, but we also speak for thousands of other past and future commercial river runners. We firmly believe that access to Grand Canyon is the right of every American as well as our international visitors. Facilitating access with the services of NPS licensed concessionaires in no way mitigates that right.

We thank you sincerely,

Pamela Whitney  
Vice President  
*Representing the Board of Directors of Grand Canyon River Runners Association*

Return your completed form to:

**CRMP Project**  
**Grand Canyon National Park**  
**P.O. Box 129**  
**Grand Canyon, AZ 86023**

928-638-7797 fax

[www.nps.gov/grca/crmp](http://www.nps.gov/grca/crmp)

**Comment Form**  
**Draft Environmental Impact Statement**  
**Colorado River Management Plan**

Name:

**Grand Canyon River Runners Association**  
**Attn: Board of Directors**  
**Post Office Box 1833**  
**Flagstaff, Arizona 86002**

E-mail address:

**Do you want to be added to the CRMP mailing list? YES**

Thank you for taking the time to comment on the CRMP. In the final EIS, every substantive comment we receive will have a response. In order to be considered substantive, your comment should (1) not just express agreement or disagreement with the analysis or conclusions in the document, but should also explain why you feel that way, and (2) be in reference to some part of the Draft EIS, or something you feel should have been in the EIS but is not. The more detail you give us, the more substantive and useful your comments will be. Please include page numbers with your comments, where appropriate. Comments must be received by February 1, 2005. This form is also available on-line at [www.nps.gov/grca/crmp](http://www.nps.gov/grca/crmp).

*Do you have any substantive comments or suggestions on any or all of the following?*

**LEES FERRY ALTERNATIVES**

Range of Alternatives (group size, motor use, trip length, launch schedule, etc.) (Chapter 2 pages 36-54)

**MOTOR USE**

We applaud the National Park Service for supporting the continuation of motorized rafts in Preferred Alternative H. We are pleased that the NPS recognizes the fact that motorized rafts do not **"permanently impact wilderness resources or permanently denigrate wilderness values"** (p.16). Grand Canyon National Park was established by Congress for the **"benefit and enjoyment of the people"** (p. 9). Retaining motorized rafting supports the management objective of providing a diverse range of quality recreational opportunities for park visitors by allowing the widest spectrum of ages, abilities and trip lengths for canyon visitors.

Motorized rafting provides a unique opportunity for the huge majority of the American and international public—those without the skills or strength or time to row their own craft more than 200 miles down a technically demanding river—to experience the river and river corridor, arguably the most significant part of the Canyon. Relatively young and relatively elderly people can more easily and safely be accommodated on motorized craft than in oar powered craft. Motorized rafts can and do carry specialized equipment (e.g. sand

ramps, wheelchairs, medical devices, etc.) and provide a safe environment on the river so that physically disabled persons can take river trips. Many Americans do not have the two-weeks (or longer) vacation time required for an oar-powered trip, but through a motorized trip can be enabled to have a quality experience which achieves the broad management goal of providing **"opportunities to experience and understand the environmental interrelationships, resources and values of the Grand Canyon without impairing the resources"** (p.10). Motorized rafts also provide support for visitors who have specialized interests in the Canyon such as hiking or kayaking, and they provide reasonably priced opportunities for extended educational field trips. For these reasons we believe that the retention of motorized rafting on the Colorado through the Grand Canyon be continued.

In a letter dated January 25, 2005 addressed to Superintendent Alston, we submitted the following recommendation as a collaborating member of the joint recommendation between the Grand Canyon River Outfitters Association, the Grand Canyon Private Boaters Association, American Whitewater and Grand Canyon River Runners Association (Appendix A):

***"The collaborating groups support the continuation of an appropriate type and level of both motor and non-motor recreational use on the Colorado River within the Grand Canyon throughout the life of the newly revised CRMP. We endorse the NPS Preferred Alternative H proposal, as modified by our recommendations pertaining to the definitions of the mixed-use and no-motors periods, to continue to utilize motorized watercraft for both commercial and non-commercial trips.***

***Motorized use as part of the system allows for far greater and broader overall public access opportunities to Grand Canyon river trips, both commercial and noncommercial, than would otherwise be possible. Without motorized use as part of the overall trip mix, the recreational use increases contemplated under the NPS Alternative H and in these recommendations would simply not be possible.***

***It is absolutely critical, therefore, that a reasonable level of the appropriate type of both motorized and non-motorized recreational use continue on the Colorado River under the updated and revised CRMP. Finally, the collaborating groups note that the number of commercial motor trip launches provided for under these recommendations is the minimum necessary in order to not unduly reduce one-boat motor trip opportunities, which have traditionally accounted for upwards of forty percent of all motor trips."***

## **TRIP LENGTH**

Trip lengths should be the same for all trip types in all seasons. There should be no disparity between commercial, noncommercial, motor and oar maximum trip lengths.

***"The minimum and maximum number of days that a trip may be in the canyon is correlated with such factors as how many miles need to be traveled each day for different trip types..."*** (p. 30). We support and agree with this statement but would point out that it seems to be in direct conflict with the proposed maximum trip lengths in Preferred Alternative H. We believe that the maximum trip days should correlate with the trip type not the boat type.

As stated in the CRMP DEIS on p. 52 the maximum trip lengths under Preferred Alternative H are as follows:

Commercial Motor = 10 days summer, 10 days shoulder, no winter use

Commercial Oar = 16 days summer, 18 days shoulder, 21 days winter

Noncommercial Oar & Motor = 16 days summer, 18 days shoulder, 25 days winter (oar)

By limiting commercial motorized raft trip lengths to 10 days or less the NPS is in effect reducing an important trip option that has been traditionally offered by specialty motor trips. Although motor trips greater than 10 days in length have historically been a small percentage of the commercial use, this type of experience has enhanced the trip diversity available to the park visitor. These trips offer visitors the time to focus on a particular aspect of the Canyon such as hiking, painting and drawing, and educational trips. Kayak, oar and dory trips have utilized motor support for years.

Park visitors who choose a commercial motor trip are unfairly discriminated against under Preferred Alternative H. The NPS has not offered any explanation in the CRMP DEIS for the proposed disparity between commercial and noncommercial motor trip lengths.

The NPS has required that commercial outfitters provide accessible trips under the Americans with Disabilities Act. Through the years outfitters have done this by both mainstreaming visitors on regularly scheduled trips as well as running industry cooperative trips. These trips are often motor and oar combination trips and range up to 16 days in length. Motorized rafts offer support for the additional equipment that is essential for people requiring wheelchairs; sand ramps for mobility, special toilet facilities, extra personal gear, etc. Motorized rafts also allow the added option for individuals with circulatory problems or heat and cold sensitivity to ride in a drier seat. Individuals who are not able to sit upright for several hours per day find the motorized raft an important option.

### **Recommendations for Trip Length**

- 1) The NPS should recognize the importance of the specialty motorized raft and accessible trips traditionally offered that are longer than 10 days in length. There is room in the CRMP for some flexibility for this trip option.
- 2) The NPS should make no distinction between commercial, noncommercial, motor and oar maximum trip lengths.

## **GROUP SIZE**

### ***Maximum Group Sizes (includes guides)***

- ***Commercial motor trip sizes would be reduced to 32 people in the summer and 24 people during the rest of the year (from 43).***
- ***Commercial oar trip sizes would be reduced to 32 people in the summer and 24 people during the rest of the year (from 39) (p. 52).***

We disagree with the reduction of commercial group size as stipulated above as a part of Preferred Alternative H. We feel the research used in support of this proposal is suspect. In conjunction with the reduction in group size a new way of measuring is proposed in the

CRMP DEIS, which includes counting crew in the group size. We will address this aspect later since it is related to the group size proposal.

Much of the information on group size preferences comes from the 1998 boater survey (Hall & Shelby, 2000). We feel there are several flaws in using this study to support group size preferences. Other information referring to group size in relation to Cultural and Natural Resources is speculation without any stated scientific data support to be found within the document. Some examples of statements regarding group size found throughout the CRMP DEIS are as follows:

***“Larger groups use more space...Thus, larger groups are known to spread up into the old high-water zone, causing impacts to natural and cultural resources that otherwise would be relatively undisturbed. Additionally, larger groups are more likely to exceed the carrying capacity of attraction sites”*** (p. 226). We find no supportive evidence in the CRMP DEIS to confirm this information. In most cases commercial passengers have a tendency to stay closer to the river not wanting to carry their gear too far from the boats. They also camp closer to the river because it is cooler in the summer months. Furthermore, passengers in smaller groups may also choose to spread out; there is nothing to prevent this from happening. When the question was asked of the NPS team at the public meetings it was admitted that no one knows who has been spreading into the old high water zone. A NPS supervisor observed Park personnel camping in the old high water zone.

***“There is no relationship between launch levels and camp encounters in Grand Canyon; 1998 data show there are similar rates of camp encounters at low, medium, and high use times. Camp encounters are related to geographical factors and trip scheduling. Groups have camp encounters in Grand Canyon...especially near popular attraction sites or exchange points”*** (p. G-6). This would support the fact that reducing group size will not have much effect on campsite competition.

***“Reducing the numbers of trips and people at one time and evening out launch patterns would reduce impacts from crowding... Six launches per day in the summer would cause more competition for campsites, but the new launch patterns would likely reduce congestion at attractions”*** (p. 251). In fact the proposed launch schedule in Preferred Alternative H would defeat this since there is no incentive for motorized companies to run trips with smaller group sizes given the reduction in motorized launches. The proposed launch pattern will reduce the number of summer launches and eliminate all the September motor launches. As a result, rather than reducing crowding this proposed launch pattern encourages outfitters to maximize group sizes, perhaps actually increasing crowding.

***“Reduced group sizes would be beneficial to soils year-round, helping protect biological soil crusts, because smaller groups tend to spread out less than larger groups. Groups of 24 in the shoulder season would be better able to use the more abundant medium-sized campsites with less probability of moving into the old high-water zone to camp”*** (p. 250). There is no supportive evidence to confirm this statement in the CRMP DEIS. It appears to be a perception but not a fact. With the reduced number of launches during the shoulder season there is no reason to believe that smaller groups will use the medium size campgrounds more. In fact with less camp competition they may

use the larger camps more often due to more availability. Small groups often use larger camps particularly near major attraction sites or exchange areas.

***“No aquatic attractions would receive more than 100 people per day in summer (Table 4-21 p. 490). The proposed launch pattern would be effective in relieving crowding and congestion at attraction sites and would indirectly reduce impacts to aquatic resources...”*** (p.501). ***“ Fewer people would be recreating in streams at one time and the area of impact would occur over a smaller area. Reduced group size, especially in the spring, would have localized, beneficial, short-to long-term, seasonal to year-round, moderate effects from current conditions”*** (p. 490). We understand that the RTS was used to predict these numbers but without the information on exactly what data was used it is difficult to analyze the information. This is also true for **Table 4-26** on p. 548.

***“In general, about one fifth of all current trips have a large (31-40) or very large (up to 44) group size, although 83% to 98% of commercial passengers prefer to be in medium to small groups... Data all show that most Grand Canyon boaters do not want to be part of or meet large groups...”*** (p. 590). This is taken from the 1998 boater survey (Hall & Shelby, 2000). In that study 85% of the commercial trips surveyed were commercial trips with a group size of <30 (Hall & Shelby, 2000 p. 31) with 46% having a group size of <20. In the study there were only four motor trips and one oar powered trip that had 31+ passengers. Furthermore crew **was not** counted in the group size as proposed in the plan for all alternatives. We contend that the survey was slanted due to the trips sampled and that the figures are very misleading (Appendix B).

***“Boaters would encounter an increase of motorized trips in spring (from less than two to two to four) and in fall (from none to two to four...)”*** (p. 622). According to Preferred Alternative H there will not be any motor launches in September or October so this seems unlikely unless the Park anticipates motorized use by research and other administrative trips during the non-motor season.

***“Attraction site encounters would be slightly higher than current levels in the summer although the sizes of groups encountered would be smaller”*** (p. 622). The proposed launch schedule does not provide the flexibility which encourages motorized companies to depart with smaller one boat trips so we would anticipate most trips having the maximum number of participants. With this in mind it is questionable whether the sizes of groups would be smaller.

***“The greatest improvement from reduced group size limits comes from eliminating large trips of 43...”*** (p. 623). It certainly seems questionable how great this improvement is going to be since they account for only 2% of the total number of trips that depart under the current regulations. ***“Lower group size limits of 32 in summer and 24 during the rest of the year for commercial motor and oar trips would help reduce adverse effect of being in or meeting large trips (see Table 4-32)”*** (p. 623). We are not sure where in the CRMP DEIS an actual case is made for the adverse effects of large groups. ***“The size of one’s own group and the size of groups one encounters affect opportunities for solitude and the character of wilderness trips, as well as logistics and dynamics within the group. People spend 24 hours a day with their own group, so “own groups size” is arguably more important than occasional encounters with***

**large groups**” (p. G-6). This does not seem to support the idea that large groups (again only 2% of total use) have much impact on the visitor experience.

**“Acceptable densities at high use sites in summer are probably less than about 30 people (not in the same group)”** (p. G-6). We were unable to find any documentation in support of this statement. Nor is there any evidence to support the following statement: **“Even during high use periods most trips saw less than 55 other people, although a few trips saw over 100 in medium and high use periods”** (p. G-6).

In reference to limits on group size (p. G-12), **Table G-4** the information was taken from the 1998 boater survey (Hall & Shelby, 2000) pp. 147-149 (Appendix B). In the study once again numbers are based on passengers, **“On average respondents believed a group size between 20 (private boaters) and 29 (commercial motor passengers) is appropriate.”** **“More importantly, the maximum acceptable group size was 30, even for those in groups that had more than 30 passengers”** (Appendix B). In both cases numbers are based on **passengers** not including crew in the proposed group size. If you take **Table G-5** on p. G-13 and take crew out of those numbers you will find that currently, the majority of trips fall within the parameters that most people favored.

### **Recommendations for Group Size**

- 1) Maintain the current cap on group size of 36 passengers for commercial trips. Given the small percentage of trips that actually fall outside the proposed group size in Preferred Alternative H the change would not have any measurable effect on crowding.
- 2) Maintain the current cap on group size of 36 passengers for commercial trips during the shoulder seasons. Since the actual number of launches per day has been reduced during the shoulder seasons any perceived or actual crowding would be minimal given the limited number of TAOT.

### **CREW/GUIDE DESIGNATIONS**

**“The number of commercial guides and crew will not count against user-day allocations, but they will be included when reporting actual river use statistics. The intent is to encourage commercial concessionaires to provide adequate numbers of guides rather than to maximize limited user-day allocations. It will also ensure that allocation comparisons with previous plans are consistent. Guides and other commercial crew will be counted within group size limits; guides are indistinguishable from other users regarding social and ecological impacts”** (p. 31).

In conjunction with group size it is important to look at the above addition to the Commercial Operating Requirements (COR's). By reducing group size limits and then counting crew within those limits concessionaires are not being encouraged to provide the additional crew members who are important to the visitor experience. Additional crew members help with interpretation, safety, resource protection, education, etc. This is where guides receive their training that is required by the NPS for certification status.

In the past crew has always been counted as part of the administrative use in the Grand Canyon. Guides are the extension of the NPS on the Colorado River. Professional guides are working while in the Canyon and not on vacation. They enforce park

regulations, give information about resource protection and provide skilled emergency interventions as well as delivering interpretive information to passengers. They lead hikes, prepare meals, and navigate some of the most challenging whitewater in North America to name a few things. In our Appendices we have included information from the 2005 COR's (Appendix C) and also a study by SWCA, Inc., Environmental Consultants for Grand Canyon Monitoring and Research Center regarding various impacts to Grand Canyon river experiences (Appendix D). Both documents reinforce the role that guides play in the river experience. The COR's show the extensive requirements a person must have to be a licensed commercial guide in Grand Canyon. To suggest that **"guides are indistinguishable from other users regarding social and ecological impacts"** (p. 31) is to negate all prior research and past history with the NPS about the role of the professional guide in Grand Canyon. In the CRMP DEIS guides are distinguished from others even by the NPS. Below are just a few examples:

***"Commercial guides and noncommercial trip leaders have the potential to facilitate social interactions, as well as provide opportunities for people to develop outdoor skills and learn about the canyon"*** (p. 172).

***"Guides should stress to their passengers the need to stay on established trails."***  
***"Guides should stress the necessity of conducting camp activities in the more resistant post-dam sandbar areas"*** (p. 234).

***"Guides can be hired on a fairly permanent basis, resulting in seasoned guides who know the river and the resources well...Because of this investment in training their guides, commercial companies can rely on them to ensure safety to their passengers, share their knowledge of the river and its resources, and provide well rehearsed, consistent, quality visitor service to their passengers on commercial river trips"*** (p. 651).

In conclusion we feel that guides and additional crew members enhance the visitor experience. To count them within the group size puts unnecessary limits on the inclusion of additional crew who would, in turn, provide interpretation, safety, resource protection and contribute to the overall quality of the visitor service.

### **Recommendations for Crew/Guide Designations**

- 1) Retain the current method of counting guides as part of Administrative Use and not as part of the proposed group size limits.
- 2) Appreciate, acknowledge and recognize the importance of the role of professional guides in the Canyon and continue to respect their ongoing stewardship of the Canyon.
- 3) Appreciate, acknowledge and reaffirm the traditional partnership that has existed between the NPS and the guiding community to protect the Grand Canyon.

### **SEPTEMBER MOTORIZED USE**

In Preferred Alternative H September is designated as part of the 6 month non-motor season. Traditionally it has been a month favored by many for its milder temperatures and more predictable weather patterns. It is a time in the Canyon when fewer families are on

trips, giving those interested in a different type of experience the opportunity to be on the river. Overall use in September has always been less, which makes it a time that offers less crowding. The CRMP DEIS has divided up the seasons in Grand Canyon differently, making September part of the fall shoulder season. This seemingly small distinction has definite ramifications for a large sector of the public. Non-motor commercial and private launches can occur at all times of the year since they are allowed during the motor season. Their season is year round, including all the best weather months. There is a small trade-off for those who wish to avoid all contact with motor craft – they can choose the shoulder or winter seasons. There is no similar trade-off for motor passengers. Preferred Alternative H eliminates one of the best weather months for motor passengers, unfairly implementing a considerably less desirable substitute.

***“Seasonality was a key factor in developing and analyzing alternatives. March and April (the spring shoulder season), May through August (summer), September and October (the fall shoulder season)... Almost all current river use occurs from March through October rather than year-round. In the development of alternatives, the same time period was compared to the other new action alternatives”*** (p. 30). On the surface this seems to indicate that throughout the CRMP DEIS when analyzing the various alternatives one is actually comparing them on a similar basis. The problem with this assumption is that under the current use patterns use is divided between Primary and Secondary Seasons not as described above. Comparisons made regarding differences in use during the “new” summer and “new” shoulder seasons give a picture that is very misleading.

According to the **Summary of Actual Yearly Use – Alternative A** (p. 38) 56 motor trips launched during the “new” shoulder season. Of these 56 launches 45 actually occurred in September, which prior to the CRMP DEIS was considered “summer”. Currently there are only 9,344 user days available for the currently configured Secondary Season. Yet according to the summary the newly designated shoulder season had 20,515 user days. That means that the difference of 11,171 user days had to have been used in September which is currently part of the Primary Season. Preferred Alternative H plans to eliminate September use for motorized trips. It incorporates a six-month motorized season with increased motorized and non-motorized commercial use in the shoulder season. However, all the shoulder season motor launches will have to occur in March or April **Summary of Probable Yearly Use** (p. 52).

Substituting March for September is not a reasonable trade. At Phantom Ranch the average daytime high temperatures in March are 71 F with the average nighttime low temperatures of 47 F. In September the average daytime highs are 97 F with the average nighttime lows of 69 F. These numbers are averages, so for a considerable portion of March temperatures can be expected to be substantially and uncomfortably lower. Although it is stated in the CRMP DEIS that the current river season includes March, only 2 commercial trips departed in March in 2003. The reason for the trade is not addressed in the CRMP DEIS other than in the statement: ***“Preliminary analysis helped establish upper bounds for non-summer use. An NPS goal was to ensure that lower density opportunities were provided in spring and fall...”*** (p. 96). It is unclear why those lower densities could not include motorized travel in September.

The most important consequence of removing September launches for motor trips is the reduction in overall launches during the traditional summer season. Preferred Alternative

H reduces the number of motor launches in the “new” summer and also removes September. The result is a major decline in the actual number of motor launches available. This reduction will result in the loss of one boat motor trips, which fulfill the smaller group size parameters encouraged throughout the plan by the NPS. An explanation of this can be seen in our (Appendix E).

### **Recommendations for September Motorized Use**

- 1) Permit motorized launches through September 15<sup>th</sup> using the same summer launch pattern proposed in Preferred Alternative H.
- 2) Make March a non-motorized month thereby keeping the 6 month non-motor season.
- 3) Recognize the importance of allowing motorized use in September as a way to maintain the existing level of one-boat motor trips.

### **VISITOR USE & EXPERIENCE (Chapter 4 pages 698-725)**

#### **TRIP DIVERSITY**

One of the CRMP DEIS management objectives for Visitor Use and Experience is to **“Provide a diverse range of quality recreational opportunities for visitors to experience and understand the environmental interrelationships, resources, and values of Grand Canyon National Park”** (p. 13). The current trip styles that have been approved and allowed by the NPS for decades offer the park visitor several options to experience the Colorado River and Grand Canyon National Park. The variety enables people of all ages, physical abilities, fiscal restrictions and time constraints to participate on a trip on the Colorado River. We feel the NPS realizes the importance of maintaining this variety.

One change that has been proposed (although not actually addressed specifically in the CRMP DEIS) is the designation of motor supported oar, dory and kayak trips as motorized launches. Until now these trips have been counted as non-motorized use. During the public meetings we were told that if a rowing, paddle, kayak, or hybrid trip has a motorized craft it will be considered a motor trip and be limited to 10 days in length. A longer trip length is needed to accommodate the slower pace set by the oar powered craft. This is inconsistent with the designation of these trips by the NPS in all prior statistics. We oppose this classification and suggest that they continue to be designated as non-motorized trips since all participants other than the motor guides are in non-motorized crafts.

We are opposed to the proposed change to the Commercial Operating Requirements that the minimum trip length to Phantom Ranch **“will be three nights and part of four days in order to provide a higher quality experience and to spread out the use”** (pp. 31-32). The current COR’s state that a **“maximum trip speed shall average no more than 40 miles per day with passengers on board and may not travel farther than 50 miles in any one day except in emergencies or when necessitated by water releases from Glen Canyon Dam that create unforeseen travel requirements.”** We support the

**current** maximum trip speed as stated in the 2005 Commercial Operating Requirements. The current requirement allows for trip flexibility and diversity.

We also encourage the NPS to add early September to the mixed use season to increase the number of available motor launches. The increase in launches during a more reasonable season will enable outfitters to continue to offer one boat motor trips at the current level. Without the additional launches most outfitters will be forced to run two boat trips in order to use their allocations.

Finally, Whitmore helicopter access is crucial to maintaining shorter trips that offer a small segment of Grand Canyon river users who would otherwise be unable to experience a river trip. The only other exchange point in Grand Canyon is near Phantom Ranch. These trips require a hike either in or out of the Canyon of 7 to 13+ miles depending on the trail used. This hike, although a highlight of the trip for many, is not for everyone. It is important to continue to provide an opportunity for shorter trips for people unable to make this hike.

In the final Colorado River Management Plan, we hope the National Park Service will continue to provide for the diverse range of Grand Canyon river trip options, styles, and itineraries that are currently offered by licensed river concessionaires.

### **Recommendations for Trip Diversity**

- 1) Return the first 15 days of September to a mixed-use season to increase the number of available motor launches which will help to maintain current level of one boat departures.
- 2) Classify motor support oar, dory and kayak trips as non-motor trips
- 3) Maintain helicopter access at Whitmore Wash
- 4) Encourage and maintain existing levels of trip diversity in Grand Canyon
- 5) Maintain the current maximum trip speed as stated in the 2004 COR's

### **Helicopter Use/Whitmore Wash**

The use of helicopters to transport people in and out of Grand Canyon from the river in the Lava/ Whitmore area has been an issue since the 1970's when first implemented. Helicopter use has increased access to short trips for people unable to hike in or out of the Canyon at Phantom Ranch. It has also helped to relieve the congestion in the Lower Gorge and at Diamond Creek since more passengers depart at this point than start their trips. The Whitmore exchange point provides an important source of trip diversity in Grand Canyon. ***“Currently approximately 6800 passengers end and 3500 passengers begin their trips by helicopter at Whitmore”*** (p. 38).

Preferred Alternative H recommends allowing helicopter use as follows: ***“Helicopter exchanges would be allowed during the four-month peak season for a total of 5000 passengers out and up to 5000 passengers in (provided the exchanges are 1:1); hiking exchanges would be allowed during the shoulder seasons for a total of 1250***

*passengers out and 1250 passengers in during the summer and winter months”* (p. 52).

**“Higher helicopter shuttle use at Whitmore was eliminated from further consideration due to impacts occurring from current use and problems of increased Lower Gorge activity (e.g., increased numbers of jetboats to take out additional “Whitmore down” passengers)”** (p. 97). Currently almost 7300 passengers end their trip on Lake Mead with an additional 2200 ending their trip at Diamond Creek for a total of 9500 passengers (p. 172, Figure 3-10). If Preferred Alternative H is implemented as stated these numbers could increase by as many as 2050 passengers (21%). An increase of this amount will have considerable impact in the Lower Gorge and on the existing congestion at Diamond Creek. Further complications could result if Alternative 4 for the Lower Gorge is adopted. It limits commercial jetboat pick-ups to four per day during peak season and one per day during non-peak season (p. 76). **“Diamond Creek is likely to have more congestion problems than Lees Ferry because it has a more constrained area and less developed facilities. Commercial motor trips are likely to continue the common practice of taking deadhead rafts to Lake Mead because it is difficult to bring large trucks down the Diamond Creek road. In addition, Diamond Creek takeout congestion is likely to increase because of Lake Mead water levels continuing to drop”** (p. 589). Adding more passengers to this area of the Canyon does not seem consistent with current observations and management objectives.

Given this assumption: **“Passenger exchanges at Whitmore bring new visitors to the river corridor, essentially requiring that these visitors are educated about how to protect canyon resources. Cultural resources below Whitmore have seen increased use, mirroring the increase in exchanges, often requiring increased management action on the part of the Park (Hubbard et al. 2001, Bullets 1996)”** (p. 548). It seems inconsistent to increase the use from Whitmore downriver by as many as 2050 passengers. We believe a better approach would be to maintain helicopter use at its current level i.e. more passengers out than in.

Conflicting information is given in the CRMP DEIS regarding exactly when helicopter use would be permitted. (pp. 744, 624 and Table 4-34 p. 593). We are uncertain which information is correct.

**“...it is assumed that all helicopter shuttles carry 5 passengers on every flight...”** (p. 341). Information provided by the Bar Ten Ranch shows that all Whitmore helicopter use is with 6 passenger helicopters which would affect the numbers on **p. 344** significantly. Instead of 2720 flights per year as stated the actual number of flights according to the Bar Ten Ranch (Appendix G) was only 1170 flights in 2004 with 136 flying days. The average number of flights per day was 8.6 without distinction between shoulder season and peak season.

In Table 4-34 on p. 593 the **“max flights per day”** under Preferred Alternative H would be 10 and **“Shuttle flights per year”** would be 1250. According to the Bar Ten Ranch statistics this could be easily accomplished without increasing the current numbers of passengers in and maintaining the 6800 passengers out.

In fact the only increase in Preferred Alternative H will be for passengers joining trips with a decrease in passengers leaving trips. **“...increased level of helicopter exchanges**

***during the motorized season and increased hiking exchanges throughout the year at Whitmore...***" (p. 625). The reason passengers have not been hiking in or out is lack of transportation between the trailhead and the Bar Ten Ranch. No information can be found in the CRMP DEIS regarding any study as to the feasibility of providing the necessary transportation needed to bring hikers and their gear between the Whitmore trailhead and the Bar Ten Ranch.

One problem which needs to be addressed and has not been would be which trip has precedence over another if only two trips can exchange per day? As far as we can see no actual planning has been suggested regarding scheduling trips based on take out point. Would preference be given to a trip with an even exchange? Were the helicopter limitations taken into consideration in the RTS estimates concerning use? We were unable to locate any of this information in the CRMP DEIS.

### **Recommendations for Helicopter Use/Whitmore Wash**

- 1) Maintain the current level of helicopter lift outs at Whitmore Wash during the entire mixed use season.
- 2) Do not encourage use of the Whitmore Trail without a study being made of the feasibility of transporting passengers to and from the trailhead.
- 3) Restrict helicopter use to certain times of the day.
- 4) Require the most recent quiet technology for helicopters.
- 5) Reassess helicopter use figures based on actual data provided by helicopter service provider.

### **PARK OPERATIONS (Chapter 4 pages 698-725)**

#### **PARK OPERATIONS**

Funding is the main and only objective in the CRMP DEIS for Park Operations. The objective stated on pp. 14 and 699 is to ***"Ensure sufficient fiscal and human resources necessary to successfully implement the plan."*** Although we agree that this is vital to the implementation of Preferred Alternative H, we were unable to find any information throughout the CRMP DEIS which shows how this objective will be met.

Park operations are currently funded as follows ***"...short-term project funding supports most of the programs. Implementing new river management operations would require short-term funding for implementation and long-term funding to ensure that management objectives, including the protection of park resources and quality visitor experiences, are met"*** (p. 699).

In the CRMP DEIS pp. 699-714 discuss impacts on Park Management and Operations for each of the alternatives. What is not discussed is a schedule of what programs would be funded first should funding not be forthcoming. We find it very difficult to comment on a

plan which lacks this information and a preferred alternative that will require so much additional funding, staffing and monitoring.

During the public meetings when different members of the NPS team were asked about the funding issues no explanation was given as to why funding would be supplied should Preferred Alternative H be implemented. Given this information and the lack of information in the CRMP DEIS it appears funding is an issue that can not be guaranteed.

Funding would be critical for the implementation of an all-user registration/adjustable split allocation system which is common to all the alternatives. Given the information received throughout the meetings it appears that the funding will come from charging people to register. The amount of the charge is unknown and to be determined at some later date. The fact that there will be a charge is not addressed in the CRMP DEIS. We question how anyone can make a valid comment with so little information.

The table located on p. 63, ***How Well the Alternatives Meet Colorado River Management or Objectives – Lees Ferry Alternatives, Table 2-5*** is very confusing. For example, under Park Management and Operations for Alternative A, it says ***“Does not meet due to current deficiencies in fiscal and human resources.”*** Under Preferred Alternative H for the same objective it says ***“Meets (with reasonable mitigation) by reducing group size, and spreading use throughout the year.”*** It is unclear to us exactly how these two answers relate to each other regarding Park Operations.

Throughout the CRMP DEIS all of the new programs are: ***“Subject to the availability of necessary funding, the National Park Service will develop a monitoring and implementation plan...”***

The phrase ***“due to lack of funding and resources”*** is used throughout the CRMP DEIS to explain why Alternative A is unworkable. The other phrase found throughout the CRMP DEIS in the mitigation sections is ***“...if adequate funding, staffing, monitoring, and implementation of the measures are maintained.”*** The phrase that is not found is how this increase in funding will be attained and what will happen if it is not obtained.

In reference to Preferred Alternative H ***“Mitigations would be similar to those described for Alternative A with approximately the same increase in staffing levels over Alternative A as described in Alternative D. This increase would be reasonable and attainable”*** (p. 251). This quote and similar statements are scattered throughout the CRMP DEIS for all sorts of impacts. The phrase not found is the definition of ***“reasonable and attainable”***. Without this information it is impossible to comment on the alternatives and the impacts associated with them.

## **CONCERNS/QUESTIONS**

1) Not openly and candidly addressing the funding sources is a major deficiency of the CRMP DEIS. Transparency in the NPS funding plans is necessary in establishing and keeping faith with the user public.

2) We are unable to discern how the proposed increases will be funded.

3) What are the consequences to the resource and visitor experience if the funding is not made available?

4) Which programs will have preference should funding not be sufficient?

### **Recommendations for Park Operations**

We encourage and strongly recommend the NPS to provide a full explanation and rationale for the public regarding how the CRMP projects and overall plan will be funded.

### **ADMINISTRATIVE USE**

***“Administrative use is considered as an addition to the recreational use allocation described in the alternatives. Administrative use includes resource management, educational, research, visitor protection, tribal and service trips. These trips will be scheduled to minimize impacts to recreational users, such as campsite competition and launch congestion”*** (p. 32). According to the NPS, administrative use enables GRCA personnel to fulfill their mandated responsibilities and the level and timing of NPS presence on the River must remain flexible. As a result any questioning of this use is considered to fall outside the scope of the CRMP DEIS.

In Preferred Alternative H there will be a six month non-motor season. This appears to present a problem given the current level of motorized research trips 64% (Table 3-21 p. 207) on the river. Unless special permission is granted, these trips will be in direct competition with commercial and private trips during the peak use season of May-August. We assume that permission to run motorized trips during the non-motor season can be granted since it is common to all the alternatives ***“Administrative use of motorized transportation and equipment would be evaluated under the minimum tool policy”*** (p. 702).

In the Preferred Alternative H it also appears that administrative use would increase. ***“There would be a continued need for administrative river trips...but at higher levels in the winter months”*** (p. 713).

We recognize the need for research, routine maintenance, resource monitoring, etc. however with the limitations being put on motorized access this increase in administrative use will increase congestion, especially during the summer and shoulder seasons. We feel this should have been addressed in the CRMP DEIS prior to recommending a six-month non motor season.

### **CONCERNS**

- 1) The CRMP DEIS does not address any plan to minimize the impacts resulting from a six month nonmotor season on the current volume of motorized research trips.
- 2) Increased congestion during the peak use months will occur since most research trips are motorized.
- 3) Preferred Alternative H will increase the need for administrative use during the winter and yet it will not allow motorized use during that time frame.

4) Not included in the CRMP DEIS is a description of the “minimum tool policy” which is used to describe how the use of motorized transportation will be evaluated.

## **LOWER GORGE ALTERNATIVES**

Range of Alternatives (group size, trip length, launch schedule, pontoon use, etc.) (Chapter 2 pages 65-79)

## **LOWER GORGE ALTERNATIVES**

We are pleased that the NPS has devoted so much of the CRMP DEIS to the Lower Gorge. As a user group, we value this part of Grand Canyon National Park all the way to the park boundary at Grand Wash Cliffs. Many commercial river runners spend time in the Lower Canyon at the conclusion of their Grand Canyon trip. Others beginning their Canyon experience at Whitmore Wash or Diamond Creek spend their entire trip in the Lower Canyon. Visitors value the natural resources, cultural resources, human history, and beauty of the Lower Gorge. Visitors who come to this section of the Canyon expect the values and management objectives of a national park to be in place. They recognize the challenging whitewater that exists and see this as an extension of the rapids of the upper Canyon as reflected in the general management plan, ***"The Colorado River, as it flows through the park, provides opportunities for one of the world's premier river experience, including [having] one of the longest stretches of navigable white water on earth"*** (p. 579). Not only are the rapids inviting but the natural resources of the upper stretches of the Lower Gorge are unique and animals that ***"are not known to occur in Grand Canyon above Diamond Creek include the razorback sucker, relict leopard frog, desert tortoise, yellow-billed cuckoo, Yuma clapper rail, and Kaibab suncup"*** (p. 156).

GCRRA recognizes that once the waters of Lake Mead inundate the Colorado River a transition takes place between management of a river and management of a lake and that the recreational values change. We suggest that some of the current management practices indicate that the NPS has lost sight of the fact that the Park boundary extends to Grand Wash Cliffs and does not end at Diamond Creek.

### **We support Alternative 4 with the following recommendations:**

***"Pontoon Use - There would be a maximum of 150 passengers per day"*** (p. 76).

We support the limit of 150 passengers per day on HRR pontoon boats in the Quartermaster area. All of these passengers enter and depart the Canyon by helicopter so numbers greater than that are inappropriate and intrusive to the natural resources and visitor experience of all river runners.

***"Group Size - Group size limits as part of continuation trips will be as defined for the Lees Ferry alternatives (see Table 2-3)"*** (p. 67).

We recommend that all noncommercial and commercial group sizes including HRR trips be consistent with those as defined in the final recommendations for the section of the Canyon from Lees Ferry to Diamond Creek with the exclusion of guides in the count as we have previously stated.

**"No limits would be placed on [HRR] trips per day in the peak season" (p. 75).**

One of the Key Trip Variables for the Lees Ferry Alternatives is Launches per Day. NPS planners used this as a foundation for their launch based model. **"The number of launches per day for each trip is one of the most important factors in assessing and addressing issues of encounters with other groups, congestion at attraction sites, competition for campsites (especially at bottlenecks), congestion at launch and takeout sites, and other visitor experience and resource issues"** (p. 28). Trips per day are limited in all areas of the Canyon by all user groups except the HRR concession. We acknowledge that use in the Lower Gorge is measured by different standards than the Lees Ferry section, however, we suggest that in reality the NPS is in fact imposing the same Launches per Day tool on all user groups in the Lower Gorge except the Hualapai River Runners. We recommend placing a reasonable limit on HRR trips per day. The launch based system would then be consistent throughout the entire Canyon. The NPS repeatedly justifies a limit of trips throughout the CRMP DEIS as a key management tool that is beneficial to the resource as well as visitor experience. Although we recognize that HRR trips would be limited by the daily passenger limits, it is highly inappropriate and negligent of the NPS to not limit trips per day especially during the peak season. Unlimited HRR trips during the peak season could potentially increase congestion at Diamond Creek as well as at attraction sites.

**"Commercial pick-ups would be limited to four per day during the peak season and one per day during the non-peak season" (p. 76).**

During the public meetings, NPS personnel openly admitted that they did not consider the impact the proposed reduction of Whitmore helicopter takeouts would have on the Lower Gorge. It is our estimation, as previously noted in the helicopter response, that 2050 additional passengers will be traversing the Lower Gorge if Whitmore helicopter use is reduced according to Preferred Alternative H. By also limiting the commercial jetboat pick-ups to four per day during the peak season we are wondering where the NPS expects these people to exit the Canyon. Diamond Creek is already congested at current use levels. We recommend that the number of jetboat pick-ups be driven by the number of trips that require these services. In reality this number is determined by the NPS trip limitations set at Lees Ferry.

**"Motorized tow-outs would be allowed below RM 260; however, if Lake Mead levels are high enough, tow-outs would be allowed at Separation Canyon (RM 240)" (p. 76).**

Separation Canyon has historically been a practical and appropriate transition place between downriver trips and upriver trips. We suggest that the experienced jetboat and tow-out operators who run the section from South Cove to Separation Canyon on a daily basis be allowed to determine if water levels are conducive to takeouts at Separation Canyon.

**"Little information about Lower Gorge visitors is available. Passengers starting at Whitmore - are typically recruited out of Las Vegas for short two and three - day trips" (p. 190).**

As stewards of Grand Canyon National Park, park personnel should become more aware of the park visitors who make the journey through the Lower Canyon. We believe that this could only enhance the management decisions that ultimately affect the park visitor and resource. Unfortunately the NPS shows its' lack of visitor demographics in the statement

above regarding visitors starting at Whitmore "are typically recruited out of Las Vegas". The truth is actually the opposite. People from across the United States as well as foreign countries take Lower Canyon trips. Many of these people are quickly absorbed by the majesty and beauty of the Lower Canyon. Commercial guides interpret the natural and cultural resources, educate visitors in Leave No Trace ethics, maneuver their boats through impressive whitewater, teach first time campers valuable skills, lead hikes to attraction sites, etc. In essence, the park visitor interacts with the resource and is often so affected that they decide to take another trip on the Colorado River through Grand Canyon. Many actually return to take a Lower Canyon trip again. We would encourage the NPS to become more involved with the visitors and Lower Gorge resource.

***"The Grand Canyon river patrols typically take-out at Diamond Creek, although at least one patrol per year (2000-2003) has continued to Lake Mead. River patrols in Zones 2,3, and 4 are the primary responsibility of the park's Meadview ranger"*** (p.298).

This indicates that the section between Diamond Creek and the Gneiss Canyon is patrolled once a year assuming that the Meadview ranger patrols upriver that far. With the proposed changes in Alternative 4 we hope that the NPS will step up the resource monitoring and patrols in the Lower Gorge area.

***"Three new campsites could be developed for HRR use (below Separation Canyon), with a low level of development (vegetation removal only)"*** (p. 76).

We support this if the "development" is consistent with resource management values that are utilized in the rest of the river corridor.

### **Recommendations for the Lower Gorge**

- 1) Limit pontoon maximum daily passengers to 150.
- 2) We recommend that all noncommercial and commercial group sizes including HRR trips be consistent with those defined in the final Lees Ferry to Diamond Creek alternative including the exclusion of guides in the group size count.
- 3) Set a reasonable limit on the number of HRR day trips.
- 4) We recommend that the number of jetboat pick-ups be driven by the number of trips that require these services. This number is determined by the NPS trip limitations set at Lees Ferry.
- 5) Allow commercial jetboat pick-up operators to determine if they can safely travel up to Separation Canyon.
- 6) Increase NPS patrols and monitoring of the Lower Gorge section. Educate personnel on the value and uniqueness of the Lower Gorge as a unique resource and section of Grand Canyon National Park.
- 7) Encourage commercial river runners (Grand Canyon outfitters as well as HRR) who use the Lower Gorge to conduct a cooperative training seminar with the NPS. This would improve communication and etiquette between the various user groups.

8) Continue to restrict upriver travel above Separation Canyon.

## **ALLOCATION**

Adjustable Split Allocation Approach (Chapter 2 pages 24-26 and Chapter 4 pages 652-653)  
Commercial/Non-Commercial Allocations (Chapter 2 pages 36-54 and 65-79)

### **ALL-USER/ADJUSTABLE SPLIT ALLOCATION**

The GCRRA opposes adoption of an adjustable split allocation mechanism and the associated registration system. The mechanism and associated registration system would continue, if not exacerbate, the allocation conflict between user sectors without offering an acceptable solution.

The NPS Preferred Alternative H includes a system (Option C: Adjustable Split Allocation, page 25) which would change the allocation between commercial and noncommercial sectors based on a registration system and measurement of "interest" in river trips. "Hopeful recreational users", both commercial and non-commercial would "first register through this system" and then be "instructed to contact a commercial company of choice directly" or "be seamlessly passed through to the noncommercial permit system." The NPS would then make "demand responsive" transfers between the commercial and noncommercial sectors to be implemented two years later. Each sector's allocation would only be eligible for reduction if its allocation for a particular month was greater than 40% of the total commercial and non-commercial launches for that month, and an allocation could not be reduced below 40% of that total.

First, as designed, the adjustable split allocation system can **only** work to decrease the allotment of launches to the commercial boating sector during the high demand summer months. The allocation system will inevitably work to decrease the number of commercial launches and increase the number of noncommercial launches until the proportion of noncommercial launches reaches 40% of the total.

Second, the National Park Service claims that they will measure "interest" and adjust allocation accordingly. The NPS does not specify exactly how this will be measured or how they will distinguish vaguely defined "interest" from actual demand. The NPS acknowledges (p. 652) that they do not currently have a system for measuring commercial sector demand, that a very expensive study would be required to attempt to accomplish this, and that even if such a study were undertaken it still would not be absolutely definitive. The system is wide open for abuses from both sides padding the numbers.

Third, at the public comment sessions the NPS was unable to answer fundamental questions regarding the all-user registration process. The NPS did state that potential river runners would have to go through a detailed webpage questionnaire to determine what type of trip they were interested in. Once they decided if they wanted a commercial trip, they would register, pay a fee and then contact the 16 outfitters. Several concerns were raised at the public meetings with very little answers. A few of these concerns are as follows:

- 1) Commercial passengers who were unaware of the mandatory registration system and called the outfitter first only to learn that reservations were full for that year. How would their demand be counted? These individuals or groups would not take the time to go through a lengthy webpage questionnaire to obtain and pay for a registration number.
- 2) Repeat commercial passengers who prefer to go with a particular trip leader would be likely to call the trip leader first without going through the registration process. Again, if the trip leader had full trips or wasn't available during the time that the passenger wanted to go they wouldn't be counted in the system.
- 3) A large percentage of people in the U.S. don't have internet access, therefore, another system would have to be implemented. Current statistics indicate that about 54% of American households have internet access.
- 4) Funding for this project would be placed upon the user in the form of an undetermined user fee.
- 5) Personal information would be collected by the government.

Finally, the NPS acknowledges (p. 714, under Conclusion) that additional staff and funding would be required to implement this system—a problematic condition given the widely recognized current shortfall in park funding.

### **Recommendations for the All-User/Adjustable Split Allocation**

In a letter dated January 25, 2005 addressed to Superintendent Alston, we submitted the following recommendation as a collaborating member of the joint recommendation between the Grand Canyon River Outfitters Association, the Grand Canyon Private Boaters Association, American Whitewater and Grand Canyon River Runners Association (Appendix A). The following is an excerpt regarding our stance on the "all user/adjustable split allocation":

***"Remove the "all-user/adjustable split allocation" element and replace with traditional fixed allocations capped at an annual user-day level of 115,500 each for the commercial and non-commercial sectors, for a total annual recreational user-day allocation of 231,000. Non-commercial use opportunities would occur year-round. Commercial use would continue in the summer months and in part of the shoulder seasons."***

***"The collaborating groups oppose the NPS proposal to adopt and implement an "all-user/adjustable split allocation" system, as we understand it, designed to measure relative commercial to non-commercial "interest" or "demand" for river trips and to adjust the allocation ratio accordingly on an ongoing basis. The elimination of this element of the original NPS Preferred Alternative H proposal (and common to all of the alternatives), is one of the primary recommendations we make, and we strongly urge the NPS to set this proposal aside."***

***The collaborating groups understand and appreciate the considerations and pressures that led the NPS to draft and present this proposal for public comment. We also recognize our own roles in helping to create the environment that gave rise to this idea. But after careful consideration of what would necessarily be such a system's inordinate complexity, heavy administrative burden and cost, polarizing effect on Grand Canyon river constituency groups, and most importantly, the overwhelming likelihood that implementation of such a system would unnecessarily***

***exacerbate and perpetuate conflict between the commercial and non-commercial Colorado River user sectors, we feel that it would be best for the NPS to abandon this management concept.***

***Instead of relying on a universal user registration system, or any other type of system that attempts to quantify and compare relative river trip "demand," the collaborating groups recommend that the NPS retain traditional fixed user-day allocations. We jointly propose and support revised user-day allocations of 115,500 each for both the commercial and non-commercial sectors, for a total annual recreational user-day allocation of 231,000.***

***This would result in an increase of 61,050 user-days for the non-commercial sector, while commercial use would remain at its current 115,500 level. Under our proposal, non-commercial use would continue all year round in a manner very similar, but not identical, to the seasons and launch scheduling outlined in the NPS Alternative H proposal presented in the CRMP DEIS. Commercial use would continue to be concentrated in a redefined summer use period, with some taking place in some shoulder months. Notably, the collaborating groups are proposing an overall recreational river use level that is less than that proposed by the NPS in its Preferred Alternative H.***

***This equal division of the available recreational use, even, as we propose, on an annual but not a seasonal or day-by-day basis, would serve several key purposes. The NPS would escape the heavy administrative, financial, and controversy burdens that would undoubtedly flow from any attempt to craft, implement, and operate a registration or demand-quantifying system on which the award of recreational allocation would be based. Moreover, continuing to rely instead on fixed allocations would relieve both user sectors from any temptation or pressure to seek to manipulate "demand" over time, in efforts to protect or enhance their interests, position, or opportunity.***

***The collaborating groups are each committed to equal fixed allocations for the commercial and non-commercial sectors, if implemented and maintained in the manner described in these policy recommendations, as the best solution to the Grand Canyon river use allocation controversy. We are further committed, should the NPS adopt our proposal to retain fixed allocations, to supporting this approach as the best and most reasonable, legitimate and appropriate solution in all our work with our own constituencies, the media, elected representatives, and the public at large. The fundamental purpose here is to return a sense of fair and equitable treatment for all Colorado River users in relation to all Colorado River users."***

## **NON-COMMERCIAL PERMIT SYSTEM**

In a letter dated January 25, 2005 addressed to Superintendent Alston, we submitted the following recommendation as a collaborating member of the joint recommendation between the Grand Canyon River Outfitters Association, the Grand Canyon Private Boaters Association, American Whitewater and Grand Canyon River Runners Association (Appendix A):

***“Replace the “weighted” lottery non-commercial permitting system proposal with a “multiple pathway” system to include two separate but complementary avenues of permit application and award: (1) a conventional, “pure” lottery under which all applicants would have an equal mathematical chance of winning a river trip opportunity, and (2) a reservations system that would allow a limited number of applicants to reserve a launch date up to three years in advance, along with the ability to register to receive a cancelled permit on short notice”.***

***“As noted in the CRMP DEIS, there is “almost universal dissatisfaction with the waitlist system” so it is imperative that the current method of allocating non-commercial river permits be overhauled and radically improved. There is no need here to review the many reasons why this system has failed and why it must be replaced with a vastly improved means of distributing non-commercial permits. Any new system must be efficient and affordable for both user and administrator, fair and equitable, and easily explained and understood.***

***Recognizing the need to and attempting to respond to diverse user needs and interests while still keeping the administrative burden manageable, the collaborating groups recommend a “multiple pathway” system to secure a non-commercial river permit. By multiple paths, we mean that there would be two means of applying for and receiving (or not) a Colorado River trip permit.***

***The dominant pathway (e.g. 70% of non-commercial launches) for receiving a launch permit would be a “pure” lottery. All applicants would have the same chance to win, and the system would start fresh each year. The other “pathway” (e.g. 30% of non-commercial launches) would be an on-line reservations system where available launches would be secured through an application process that would include identifying participants and paying fees in advance. Under both access pathways, cancellations would appear as available launch dates in the on-line reservation calendar.***

***The collaborating groups recommend against a “weighted” lottery system as put forward in the NPS Preferred Alternative H. Our concern is that due to its weighted nature, such a system will quickly degenerate into something similar to the current “one-size-fits-all” waiting list system, complete with the same frustrating permitting and access issues. For example, by our analysis the length of time that new entrants to the system must wait before winning the lottery will grow rapidly as long as there are more applicants than launches. The collaborating groups believe that a “multiple pathways” approach would do a better job of meeting the diverse needs of recreational river runners.***

***Concerning transition from the current situation to a new system, the collaborating groups support measures to encourage applicants to leave the existing unsatisfactory waitlist system, including:***

- A. A multiplicity of other choices for getting a permit (i.e. the lottery and the reservation system);***
- B. Extra lottery chances for the first two years of the lottery if they enter it, with the number of extra chances based on time on wait list; and***

**C. Financial incentives based on vested waiting time."**

**OPERATING REQUIREMENTS CHANGES**

(repeat use, generators, site restrictions, etc.) (Chapter 2 pages 30-32)

**COMMERCIAL OPERATOR RESPONSIBILITY FOR PASSENGERS**

***"Require outfitters to provide a hiking guide for exchange passengers hiking out and require exchange passengers to begin their hikes out by a certain time in the morning (especially in the summer months) " (p. 585).***

For decades commercial river passengers have safely hiked in and out of the Canyon along the Bright Angel and Kaibab trails to meet or exit river trips. Passengers book a Phantom exchange trip for various reasons. Some visitors choose this option because of the trip length or the option of spending the night at Phantom Ranch while others want the experience of hiking in or out of the Canyon. Just like the thousands of annual park visitors who hike the main corridor trails, commercial river passengers often do so to gain a personal sense of accomplishment by hiking the Canyon. We believe that commercial river passengers should continue to enjoy this experience at their own pace without the presence of a guide just like the annual park visitor and noncommercial boater does.

During a typical Phantom exchange hikers are departing the river while the new passengers are hiking down from the rim. Two guides would be needed for each exchange: one to hike the group in while the other hikes the departing group out. This would require commercial outfitters to either employ additional personnel or hire a commercial hiking service. Ultimately, the river passenger would endure the added expense in their trip price.

People hike at different paces and become separated along a trail. The longer the trail the more separated hikers become. Fitness levels of individuals vary. A guide who would be in charge of leading several river passengers in or out of the Canyon would soon be hiking with the slowest person at the back of the group. Faster, more conditioned hikers could realistically reach the destination hours before the guide would. It should be noted that the presence of a guide is no guarantee that NPS rescue assistance would not be needed for a hiker who gets in trouble.

We suggest that the Park show justifiable reason for creating a new regulation before it does so. ***"During hot summer days, fatigue or heat-related conditions can affect boaters hiking out of the canyon, often requiring search-and-rescue responses from NPS rangers"*** (p. 178). The charts on pg. 171 and 172 indicate that 4,052 commercial passengers joined or left river trips at Phantom from 1999-2002. We were unable to locate where in the CRMP DEIS actual NPS statistics for commercial river passengers that required a search and rescue response and therefore are unable to quantify the word "often". We ask of the 4,052 passengers previously noted, how many received search and rescue assistance? Is the number high enough to spark a new regulation? We did find on the NPS webpage located at:

<http://www.nps.gov/grca/grandcanyon/dayhike/index.htm> that 250 park visitors are rescued each year while hiking the Canyon. How many of these were river boaters? What

percentage of these visitors were commercial river passengers? Will the Park require that a hiking guide lead all park visitors including noncommercial boaters? We hope that the NPS will quantify statistics when evaluating the need to implement a new rule. We also hope that the NPS will allow all visitors to experience corridor hiking on an equal footing.

We request that the Park reconsider the following: ***"require exchange passengers to begin their hikes out by a certain time in the morning (especially in the summer months) "*** (p. 585). Instead of making this a requirement we recommend that the Park emphasize this to commercial operators as well as in the noncommercial orientation and trip information packets. Commercial trip leaders try to camp as close to Phantom as possible to allow passengers to begin their hike in the morning, however, uncertain circumstances such as river accidents, unavailable campsites, etc. interfere with this ability. The NPS should stress to commercial and noncommercial trip leaders that camps that are within 10 miles upstream of Phantom be utilized by exchange trips, however, we don't advocate camp designation.

Commercial outfitters invest a lot of time in preparing guests for the exchange hike. Lunches, electrolyte replacement products, snacks and water are provided to each passenger as well as safety tips before their ascent. Many guides encourage their guests to begin hydrating for the hike the night before. Well before their river trip begins exchange passengers are informed about the strenuous hike by means of outfitter brochures, phone conversations, NPS approved trip information packets and websites. It is our experience that passengers are well informed before hiking the Bright Angel and Kaibab trails although we also recognize that it is difficult to completely describe the rigors of a canyon hike. We would also suggest that commercial river passengers are more educated in Leave No Trace ethics and more informed than the regular park visitor who hikes on the corridor trails without guide supervision.

### **Recommendations for Commercial Operator Responsibility for Passengers**

- 1) We recommend that the NPS emphasize education before creating a new regulation.
- 2) The NPS should stress to commercial and noncommercial trip leaders that camps within 10 miles upstream of Phantom be utilized by exchange trips.
- 3) We recommend that the NPS Inner Canyon/Backcountry Bright Angel Trail webpage located at [http://www.nps.gov/grca/backcountry/trails/bright\\_angel\\_trail.htm](http://www.nps.gov/grca/backcountry/trails/bright_angel_trail.htm) be updated (Appendix F). Links to the sections on Hiking Tips and Summer Hiking should be included on the Bright Angel and Kaibab trail pages. Each river outfitter that offers Phantom exchanges could then have a link to the official NPS information regarding hiking in the Canyon.
- 4) The NPS, commercial river outfitters and private boaters could jointly design a hiking handout. This could then be sent to all Phantom exchange passengers in the trip information packets mailed by river outfitters. The NPS could include the handout in noncommercial trip packets. To cut printing costs, this pamphlet could be produced in a PDF format and xeroxed by all users.

5) The PDF created hiking handout could also be mailed (electronically or surface) to potential commercial and noncommercial boaters so that they have the NPS approved information before making a reservation.

## **GUIDES**

See response under **Crew/Guide Designations**.

## **LITTLE COLORADO RESTRICTIONS**

Common to all alternatives the following change is proposed in the Commercial Operating Requirements (COR's), ***“No boats will be allowed to enter or park in the Little Colorado River. To stop in the vicinity of the Little Colorado River, boats may, however park upstream or downstream of the river’s mouth. Swimming and wading in the Little Colorado River will be limited to the lowermost 300 feet from March 1 through August 31...The purpose of these restrictions is to protect spawning and young-of-the-year humpback chub, an endangered species”*** (p. 31). We were unable to find any research documentation that supported the need for this type of restriction in the CRMP DEIS. We did find this statement which does seem to be a bit subjective, ***“Gorman and Stone (1999) reported a reduction in catch rates over the past decade in the Little Colorado River near the confluence with the Colorado River; recreational activity is a suspected cause”*** (p. 483). The NPS simply has not made a case supporting closing the Little Colorado River for swimming and wading above the first 300 feet from March 1 through August 31. They were unable to get any input from the US Fish and Wildlife Service regarding the humpback chub (Appendix H).

We did find mention of research that supported a different view. ***“Fall into winter is suspected to be an important growth period for young of the year humpback chub, according to a review of 30 years of data by Meretsky et al. (2000)”*** (p. 145). Also noted, ***“Population estimates made in 2001 and 2003 for the humpback chub aggregations in and near the Little Colorado River indicate a real and significant decline in numbers over the last decade (Van Haverbeke and Coggins 2003; Van Haverbeke 2003)...In an overview of status and trend of the humpback...They have attributed the decline to habitat modification and predation and competition by nonnative fish species”*** (p. 151). This does not seem to support the closing of the Little Colorado as proposed.

In reality Glen Canyon Dam has the most effect on the humpback chub. ***“The major factor cumulatively affecting threatened, endangered, and sensitive species in the river corridor is the operation of Glen Canyon Dam. The effects of the dam far outweigh the effects of river recreationists on aquatic...”*** (p. 515).

The usual practice of floating the rapids in the Little Colorado serves a purpose that is more than just recreational. It can help prepare all river users in the event that they might find themselves in the main river. Although the rapids encountered on the Little Colorado are much smaller than most in the main stream the experience is similar and instructive. Relegating swimming to the first 300 feet presents a safety concern which would potentially expose passengers to the heavy current of the Colorado River.

### **Recommendations for the Little Colorado River Restrictions**

- 1) The case for closing the Little Colorado above 300 feet having not been made, the NPS should not close the mouth of the Little Colorado above the first 300 feet. And, if the NPS believes there may be a case to be made for such closing, we recommend -
- 2) The NPS should conduct additional research regarding the effect of recreational use on the humpback chub and, if research supports changes,
- 3) The NPS should consider closing the mouth of the Little Colorado River during the major spawning season only.

### **MINIMUM TRIP LENGTH TO PHANTOM RANCH**

See response under **Trip Diversity**.

### **COMMERCIAL GUIDES ON NONCOMMERCIAL TRIPS**

We support the requirement that “*commercial guides may not be hired to assist on noncommercial trips*” (p. 32).

### **OTHER COMMENTS** (please use the back for additional comments)