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Superintendent
Grand Canyon National Park
P.O. Box 129,
Grand Canyon, Arizona 86023

Dear Superintendent,

Grand Canyon River Guides, Inc., (GCRG) founded in 1988, is unique in that it provides a unified voice for river guides and river runners in defense of the Colorado River corridor through Grand Canyon. Our non-profit educational and environmental 501(c)(3) organization is comprised of over 1,700 individuals who are passionately dedicated to the continuing preservation of this national icon. Consequently, Grand Canyon River Guides' goals are to:

Protect the Grand Canyon,
Set the highest standards for the river profession,
Celebrate the unique spirit of the river community and
Provide the best possible river experience

Although GCRG focuses on river related issues, protecting *all* that makes Grand Canyon unique is our primary mission. We are hopeful that the broad comments we provide here may be useful in developing a strong Backcountry Management Plan for Grand Canyon National Park.

PURPOSE AND NEED:

According to Station 1, Poster #2, the purpose of the Backcountry Management Plan is *“to establish a management framework that allows the public to experience Grand Canyon’s unique backcountry and wilderness areas while protecting resources and*

values.” This statement suggests that the visitor experience is the primary concern. It strikes us that the *first* priority of Grand Canyon National Park, in keeping the NPS conservation mission, is to protect park resources and values. The General Management Plan of 1995, which is one of the guiding documents for the Backcountry Management Plan, provides the appropriate emphasis and prioritization when it states:

- As a place of national and global importance, Grand Canyon National Park is to be managed to... preserve and protect its natural and cultural resources and ecological processes, as well as its scenic, aesthetic, and scientific values [and, if consistent with the NPS preservation mandate],
- provide opportunities for visitors to experience and understand the environmental interrelationships, resources, and values of the Grand Canyon without impairing the resources.

MANAGING FOR WILDERNESS:

In the absence of a Wilderness Management Plan, we support the goal of providing “a framework and programmatic guidance for consistent decision making in managing backcountry and proposed wilderness” (Station 1, Poster #2). We also support the use of the minimum requirement concept. GCRG concurs that lands that are designated as proposed wilderness must be managed as wilderness until such a time as they are either designated as wilderness or denied designation. It is worth noting that the 1964’s Wilderness Act’s primary purpose is to preserve and protect lands “in their natural condition.” Although the Wilderness Act in section 4(b) acknowledges that wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation and historical use, it does not require them to be *optimized* for such public uses.

ADDRESSING THE BIG PICTURE:

The revised Backcountry Management Plan should “think big” by incorporating: 1) the preservation of natural ecosystem processes within the park 2) ecosystem, rather than single species, management 3) forward thinking climate change measures, 3) improved cooperation and collaboration between management agencies and other stakeholders, 4) landscape-scale conservation, and 5) a strong commitment to the preservation of irreplaceable and non-renewable cultural resources that are integral to the understanding of the historic record of the Colorado Plateau.

EDUCATION, EDUCATION, EDUCATION:

More education is always preferable to more rules. This also cuts down on the need for added enforcement – a mitigation measure that is undesirable as well as problematic from a funding and staffing standpoint. Enforcement reminds visitors that their trip is in a controlled environment and not necessarily a true wilderness experience.

Specific recommendations are:

1) The inclusion of education as a long-term management strategy will allow it to take a more prominent role in mitigating potential negative impacts to all canyon resources. Education is the precursor to stewardship as it is necessary for backcountry visitors to understand these resources in order to value them, and they must value them before they will protect them.

2) Additional monitoring assistance could be provided by specific backcountry user groups with oversight provided by the Park Service. Such a program will result in several distinct benefits: building resource knowledge within backcountry stakeholder groups, providing additional (no cost) assistance for monitoring duties, and investing backcountry users with a sense of stewardship and advocacy.

3) Standards for cultural sites in Grand Canyon should be articulated to the public at large, which in turn ensures accountability and aids compliance. The park has done an excellent job disseminating information about their important archeological work along the river corridor to the river running public. Similar efforts geared towards backcountry users could be very effective in helping to build the understanding needed to better protect these fragile and irreplaceable resources.

4) Expand cultural resource education to include tribal perspectives and Traditional Cultural Properties of the various tribes who view Grand Canyon as sacred. Making the link between the archaeological past and living cultures is important.

4) Look to the type of educational materials that have been developed or are in process for the river corridor such as the video at Lees Ferry, the River Courtesy Flyer, or the Action Guide for Preservation, and extend those types of outreach efforts to backcountry users.

INTERRELATED PLANS

The NPS specifies a number of projects as being beyond the scope of the backcountry management plan, including the Colorado River Management Plan and aircraft overflights. We disagree that the CRMP should be “outside the scope” of this plan. The 1988 Backcountry Management Plan stated, *“It is also a goal of this plan to be consistent with other park plans, such as the Colorado River Management Plan, to the maximum extent possible.”* We feel that the revised Backcountry Management Plan should maintain and honor this goal.

Additionally, the 1988 Backcountry Management Plan goes on to say that *“Additional legislation and executive orders which influence backcountry management include ... Public Law 100-91 of 1987 (regarding aircraft management).”* The protection of the Grand Canyon backcountry, the preservation of its wilderness resources, and the quality

of the visitor experience in the backcountry are intimately tied to the overflights issue and the outcome of the NEPA process regarding air tour regulation that is currently underway. The backcountry experience is not limited to a visual one but an auditory experience as well where natural quiet is a highly treasured value. Again, the updated Backcountry Management Plan should retain this linkage.

Piecemeal management of Grand Canyon is contradictory to the Park's ultimate goal - preservation. Therefore GCRG recommends that all of these major plans should fully reference, inform, and relate to one other to create a cohesive whole by including them in an "Interrelated Plans and Documents" section.

Grand Canyon River Guides greatly appreciates the opportunity to offer suggestions on the development of this revised Backcountry Management Plan. We urge Grand Canyon National Park to develop a robust plan that ensures transparency, and builds accountability, while achieving the fundamental purpose of national parks,

"... to conserve the scenery and the natural and historic objects and the wildlife therein and ...provide for the enjoyment of the same in such a manner and by such means as will leave them unimpaired for the enjoyment of future generations." (NPS Organic Act)

Sincerely,
The Officers and Directors
Grand Canyon River Guides, Inc.